

## Part 2A of Form ADV

Walsh Financial Solutions, LLC

5610 Ward Rd, Ste 300  
Arvada, CO 80002

(303) 252-0852

[www.walshfinancialsolutions.com](http://www.walshfinancialsolutions.com)

February 5, 2026

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](mailto: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](http://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 8, 2025, the following material changes have occurred:

### Item 4 – Advisory Business

- We renamed our Financial Counseling services to Financial Consulting.
- We provided more detailed explanations of the services that we do provide and the services that we do not provide.
- We made edits for clarity.

### Item 5 – Fees and Compensation

- For our Financial Consulting services, we increased our fee from \$250.00/hr to \$275.00/hr.
- For our Financial Planning services:
  - We made updates to the Net Worth component of our fee calculation formula.
  - We increased our minimum fee from \$2,500.00 to \$3,000.00 for individuals and from \$4,000.00 to \$4,800.00 for couples.
- We will not accept payment for services not yet rendered.
- We provided more a detailed explanation of our Fee Offset Payment Arrangement, including our related invoicing policies and practices.
- We made edits for clarity.

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](mailto:info@walshfinancialsolutions.com) or visit our website, [www.walshfinancialsolutions.com](http://www.walshfinancialsolutions.com), and click on Form ADV Part 2.

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Vanderbilt Financial Group is the marketing name for Vanderbilt Securities, LLC and its affiliates.

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

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

Walsh Financial Solutions and Vanderbilt Financial Group are separate and unaffiliated entities.

For additional information on services, disclosures, fees, and conflicts of interest, please visit [www.vanderbiltfg.com/disclosures](http://www.vanderbiltfg.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) types of financial planning services that are tailored by your individual needs, objectives, and circumstances. These services blend both financial and life conversations; and, they are designed to examine your financial picture, in parts or in its entirety.

Our services do not include ongoing or continuous supervision or management of your cash, securities, or other assets. If you wish to receive those services, you will necessarily enter into a separate advisory contract with Vanderbilt Advisory Services or a different Registered Investment Advisor of your choosing.

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 Consulting

According to your financial needs and stated objectives, we will provide financial analysis and advice to you through an hourly consultation. With respect to your specific financial questions and/or issues and within the specified terms of our advisory contract, we will provide verbal and/or written recommendations to you relating to the following planning areas:

- 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

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- Financial Independence Strategies and Retirement Planning
- Tax Efficiency Strategies and Tax Planning
- Estate and Legacy Planning

The services may include written communications, phone or Zoom calls, research and analysis, preparation for meetings, office or virtual visits, or report preparation and production; however, our work, our recommendations, and the extent of our fiduciary responsibilities will be circumscribed by: the information that you provide to us, the financial analysis and advice that you request from us, and the amount of time that you pre-approve and make available to us. Should the scope and/or complexity of the services change within the course of our work, we will notify you and seek your approval to amend our advisory contract.

Services will begin on the date specified in our advisory contract and will end at our presentation of the recommendations and our delivery of any mutually agreed-upon deliverables, unless otherwise terminated.

Financial Consulting services do not include ongoing planning, service, or support. If you wish to receive those services, you will necessarily enter into a new advisory contract for Financial Planning services.

### Financial Planning

According to your financial needs and stated objectives, we will provide in-depth and personalized financial analysis and advice to you through ongoing planning, service, and support. The Walsh Financial Solutions 5 Step Financial Planning Process provides for verbal and/or written recommendations relating to the following planning areas:

- 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

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.

The services will include all work required and performed by our advisory representatives regardless of the actual number of hours spent, to discuss your personal finances, implement our recommendations, or

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revise your personal financial planning. It may include written communications, phone or Zoom calls, research and analysis, preparation for meetings, office or virtual visits, or report preparation and production.

The term of our advisory contract is typically 12 months. Services will begin and end on the dates specified in our advisory contract, unless otherwise terminated.

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, 2025, 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 Schedules.

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

### Financial Consulting

The fee for Financial Consulting is \$275.00 per service hour, billed in 15-minute increments. We will provide an estimation for the services identified and the hours required before we render any work or advice.

### 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 fixed fee can be calculated, on the basis of your Income and Net Worth. We will determine the fee using the following formula:

- Income 1.00%, plus

#### Individuals

- Net Worth (minus ½ of real estate equity) from \$0 to \$2,500,000 0.50%, or
- Net Worth (minus ½ of real estate equity) from \$2,500,001 to \$5,000,000 0.40%, or
- Net Worth (minus ½ of real estate equity) from \$5,000,001 to \$10,000,000 0.25%, or
- Net Worth (minus ½ of real estate equity) for \$10,000,001 and over 0.10%

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### Couples

- Net Worth (minus ½ of real estate equity) from \$0 to \$4,000,000 0.50%, or
- Net Worth (minus ½ of real estate equity) from \$4,000,001 to \$8,000,000 0.40%, or
- Net Worth (minus ½ of real estate equity) from \$8,000,001 to \$16,000,000 0.25%, or
- Net Worth (minus ½ of real estate equity) for \$16,000,001 and over 0.10%

Income is defined as the Adjusted Gross Income (AGI) reported on your prior year's Federal Income Tax Return, unless we mutually agree that your current year's expected income will be significantly different, in which case we will use your current year's expected income in our fee calculation instead.

Net Worth is defined as your Assets minus your Liabilities. Net Worth includes items such as: personal or rental real estate (including primary home), cash, securities, vested stock options/restricted stock units, retirement accounts (vested account balances only), cash value of life or other insurance products, outstanding mortgages, or other outstanding debts. Net Worth does not include items such as: Donor Advised Fund balances, unvested stock options/restricted stock units, employer-sponsored pension plans, business valuations, assets, or liabilities, or personal property such as automobiles, household goods, collectibles, or jewelry. Assets and liabilities are measured based upon their fair market value.

We may, in our sole discretion, increase or decrease our fixed fee as calculated above, after taking your unique circumstances and needs into consideration.

For new advisory contracts, for a 12-month rolling period, we set the fixed fee upon engagement. Our 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.

If you wish to reengage our services after the initial 12-month rolling period, for the remainder of the calendar year, we will offer an extended advisory contract to you, setting the extended fixed fee upon engagement. Your extended fixed fee will equal: the prior year's fixed fee prorated from the date that we extended our advisory contract to December 31<sup>st</sup>, based upon a January through December calendar year.

For renewing advisory contracts, for the purpose of recalculating our fee for the new service term, we will use the Net Worth Statement provided to you in the prior service term. If, in the prior service term, your net worth information or your prior year's Federal Income Tax Return was not provided to us, we will use our discretion to adjust and set forth our fee for the new service term based on the scope and/or complexity of the service that we anticipate providing to you.

We require a minimum Financial Planning fee of \$3,000.00 for individuals and \$4,800.00 for couples to properly administer financial advice.

### **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

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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 our fee by check or via an online merchant service provider.

We will not accept payment for services not yet rendered.

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 Arrangement

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.

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

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fee charged by Walsh Financial Solutions. The receipt of this independent and separate compensation creates a conflict of interest and it may affect our advisory representatives' judgement when they recommend investment and/or account changes.

If agreed upon by you and Walsh Financial Solutions, we will credit our 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. These credits are non-refundable and will expire upon completion of the first subsequent service term.

You may 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.

We reconcile client fees and credits annually; and, we will provide an accounting of the fees and credits to you annually.

If, during a current service term, an anticipated credit(s) will be less than or greater than our fee and you own an advisory investment account(s) through Vanderbilt Advisory Services, you may choose to increase or decrease the investment advisory fee percentage(s) assigned to your account(s) accordingly.

If, at the completion of a service term and after the credit(s) has been applied, your balance has a debit of \$500 or more, you will receive a billing statement from us.

If you terminate our advisory contract and after the credit(s) has been applied, your balance has a debit of \$0.01 or more, you will receive a billing statement from us.

For all clients who elect to use our Fee Offset Payment Arrangement: Other than for terminated advisory contracts, we invoice annually, in arrears, and your payment is expected in full upon receipt of a billing statement. You may make installment payments throughout the term only for services already rendered; they will be applied toward our fee.

For Financial Consulting clients who elect not to use our Fee Offset Payment Arrangement: We invoice after our presentation of the recommendations and our delivery of any mutually agreed-upon deliverables. Your payment is expected in full upon receipt of a billing statement.

For Financial Planning clients who elect not to use our Fee Offset Payment Arrangement: We invoice quarterly, in arrears, and your payment is expected in full upon receipt of a billing statement.

### Termination and Refunds

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

In the event of a termination, we will follow our Early Termination Fee Schedule accordingly. Since fees are paid in arrears, a refund will not be issued.

### Early Termination Fee Schedule

- Financial Consulting
  - \$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
  - Our extended fixed 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
  - Our fixed fee prorated from January 1<sup>st</sup> to the date of termination, based upon a January through December calendar year

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.

In the event of a terminated advisory contract, we invoice after our delivery of any mutually agreed-upon deliverables and payment is expected in full upon receipt of a billing statement.

### 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.

### 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 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

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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.

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.

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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.

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

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

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

Walsh Financial Solutions and Vanderbilt Financial Group are separate and unaffiliated entities.

For additional information on services, disclosures, fees, and conflicts of interest, please visit [www.vanderbiltfg.com/disclosures](http://www.vanderbiltfg.com/disclosures)

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

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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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