

Item 1: Cover Page



Form ADV Part 2A Investment Adviser Brochure

August 2020

This brochure provides information about the qualifications and business practices of Haviland & Sams, LLC. If you have any questions about the contents of this brochure, please contact Benjamin B. Sams, Owner, Advisor - Managing Principal and Chief Compliance Officer, at 860.678.1414 or bsams@havalandsams.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 Haviland & Sams, LLC is also available on the SEC's website at <https://www.adviserinfo.sec.gov/Firm/127175>.

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Item 2: Summary of Material Changes

Annual Update

In this Item of Haviland & Sams, LLC's (Haviland & Sams or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated March 28, 2019.

Material Changes since the Last Update

Since the last Annual Amendment filing, the Firm has no material changes to report.

Full Brochure Available

Haviland & Sams' Form ADV may be requested at any time, without charge by contacting Benjamin B. Sams, Owner, Advisor - Managing Principal and Chief Compliance Officer, at 860.678.1414 or bsams@havilandsams.com.

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Item 4: Advisory Business

Firm Description and Types of Advisory Services

Haviland & Sams is a financial advisory and consulting firm providing financial modeling and planning services for corporations, individuals (including high net worth individuals) and families including business owners, professionals, corporate executives and those with independent resources. Haviland & Sams also provides investment portfolio advisory services to our clients, which includes the selection of other advisors.

The Haviland Group was founded in 2003 and changed its name to Haviland & Sams in 2010.

Principal Owners

Haviland & Sams is owned by Benjamin B. Sams.

Types of Advisory Services

Haviland & Sams provides three distinct services - Wealth Management, Independent Investment Manager Search and Monitoring, and Ad Hoc Consulting.

Wealth Management

Haviland & Sams provides its clients with a four-step process to evaluate current and future needs and to design strategies to assist in meeting those needs.

1. **Protect** - Evaluate areas of financial risk and, where appropriate, make suggestions for mitigating that risk. Provide business continuity planning and value realization strategies for owners of closely held businesses.
2. **Plan For Growth** - Develop an investment strategy that identifies the client's needs and risk tolerance and defines an appropriate investment policy statement. This strategy may include recommendations for engaging independent investment managers to manage all or part of the client's investable assets.
3. **Plan For Enjoyment** - Help clients develop the financial values and habits necessary for a successful financial life, including the development of a prudent retirement strategy, charitable giving strategies, and a process for monitoring the ongoing success of the plan.
4. **Plan For Perpetuation** - Advise clients on the development of an estate plan that addresses asset distribution, estate administration, trust management techniques, income replacement, child custodial arrangements, and estate tax reduction strategies.

Haviland & Sams gathers required information through in-depth personal interviews and data collection. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are analyzed and appropriate strategies and recommendations are developed. Should a client agree to the recommendations

contained in the plan, Haviland & Sams will work closely with the client and other appropriate advisers to assure complete implementation.

Additionally, Haviland & Sams provides advice on non-securities matters. Generally, this is in connection with the rendering of estate and insurance planning and business ownership advice.

Haviland & Sams will meet with the client periodically, and as needed throughout the year to review the client's situation and, if needed, suggest changes to the client's strategy.

Recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company.

Independent Investment Manager Search and Monitoring

Haviland & Sams may perform management searches and analysis of various independent investment managers for the purposes of managing the client's portfolio assets. Based on a client's individual circumstances and needs, Haviland & Sams will determine, with the client, which independent investment manager's portfolio management services are appropriate for that client. Factors considered in making this determination include total asset value, management style, risk tolerance, the opinion of each client and the investment philosophy of the independent manager. Clients should refer to the independent investment manager's disclosure document for a full description of the services offered. Haviland & Sams will meet with the client on a regular basis, or as determined by the client, to review portfolio holdings, asset allocation and performance.

If Haviland & Sams believes that a particular independent investment manager is performing inadequately, or if Haviland & Sams believes that a different independent investment manager is more suitable for a client's needs, then Haviland & Sams may suggest that the client contract with a different independent investment manager. Under this scenario, Haviland & Sams will assist the client in selecting a new independent investment manager and then monitor that independent investment manager's performance. However, any move to a new independent investment manager is solely at the discretion of the client.

Haviland & Sams works with two multiple investment manager platform programs: Schwab Institutional, and Lockwood Financial Services, a subsidiary of The Bank of New York. Haviland & Sams also recommends independent investment managers who may not be on the platforms mentioned above.

Ad Hoc Consulting

Haviland & Sams provides consulting services to business owners in the areas of ownership management, continuity planning, business value realization, and retirement plan services.

For retirement plan services, the Firm provides recommendations as to the appropriate, limited array of investment options to be chosen from the mutual funds available through the plan's third-party administrator investment platform. At the client's request, Haviland & Sams also provides informational and educational services to plan participants through employee

meetings, and other manners of communication to assist the participants in learning how to properly utilize the plan and the investment options therein. Haviland & Sams does not have custody, control, discretionary authority, responsibility for execution and does not take responsibility for valuation, recordkeeping, or proxy voting.

Tailored Relationships

Haviland & Sams tailors investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in an Investment Policy Statement that is prepared by Haviland & Sams and the client. In the consultation with the independent investment manager, Haviland & Sams clients are allowed to impose restrictions on the investments in their account. Haviland & Sams may accept any reasonable limitation or restriction to discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to Haviland & Sams in writing.

Fiduciary Statement

Haviland & Sams and its employees are fiduciaries who must take into consideration the best interests of the Firm's clients. Haviland & Sams will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. Haviland & Sams will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

As a fiduciary, Haviland & Sams has the obligation to deal fairly with clients. Haviland & Sams has the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Wrap Fee Programs

Haviland & Sams may recommend wrap fee programs offered by Lockwood Advisors, Inc. Haviland & Sams receives a portion of the total wrap fee for its portfolio supervisory services. More detail on these programs may be found in each program's Form ADV Part 2A Appendix 1, which is available directly from Lockwood Advisors, Inc.

Client Assets

Haviland & Sams does not directly manage client assets.

Item 5: Fees and Compensation

Compensation

Haviland & Sams is compensated by charging a fixed fee, a percentage of advised assets, and in some cases, an hourly fee.

Haviland & Sams' fee schedules are described below.

Compensation – Wealth Management Services

Clients will be charged an annual fixed fee, typically ranging from \$3,000 - \$35,000, depending on the nature and complexity of each client's circumstances. Fees are charged quarterly in advance. Clients may request other schedules for payment.

Haviland & Sams may provide Wealth Management Services to clients of other professional organizations, including investment advisers. In these instances, Haviland & Sams will be paid either a fixed fee, or the fee will be stipulated as a percentage of assets under Investment Advisory Management, billed quarterly based on the value of the investments on the final day of each calendar quarter.

Compensation – Independent Investment Manager Search and Monitoring

Clients whose assets are custodied at Schwab may be charged an annual asset-based fee of up to 1% payable quarterly in arrears. This fee is exclusive of management and transaction fees which may be charged by other investment managers and custodians.

Clients in the Lockwood wrap fee programs may be charged an annual asset-based fee up to 2% payable quarterly in advance, that is divided between Haviland & Sams and Lockwood Advisors, Inc. This fee includes all management and transaction fees which may be charged by other investment managers and custodians.

Compensation – Ad Hoc Consulting

Clients may be charged hourly rates ranging up to \$350. Haviland & Sams may ask for a retainer of up to 25% of the estimated fee at the start of the consulting service, with the balance due upon completion of the services. Haviland & Sams will not require that a client pay a retainer that it does not expect will be earned within six months. For retirement plan services, clients may be charged a fixed quarterly fee and a participant fee, payable quarterly in advance. Fees typically range from \$2,500 - \$5,000.

Calculation and Payment

The specific manner in which fees are charged by Haviland & Sams is established in a client's written agreement with Haviland & Sams. Haviland & Sams will calculate fees in advance or arrears on a quarterly basis. Clients may elect to be invoiced directly for fees or to authorize Haviland & Sams to directly debit fees from client accounts.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Agreement Terms

A client may terminate the client agreement at any time by notifying Haviland & Sams in writing.

General Information on Compensation and Other Fees

In certain circumstances, fees, account minimums and payment terms are negotiable depending on a client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Fees charged by Haviland & Sams are separate and distinct from advisory fees and expenses charged by independent investment managers or separate accounts in which client assets may be invested. A complete description of these fees and expenses may be found in each investment manager's contract.

In addition to Haviland & Sams' fees, clients may also incur certain charges imposed by third parties which may include the following: mutual fund or money market 12b-1 and sub transfer fees; limited partnership management and incentive fees; and trade transaction fees or ticket fees, and other fees.

The client should review all fees to fully understand the total amount of fees and to evaluate the advisory services being provided.

Item 6: Performance-Based Fees and Side-by-Side Management

Neither Haviland & Sams nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Haviland & Sams does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Types of Clients

As described in Item 4, Haviland & Sams' clients include corporations, individuals (including high net worth individuals) and families, including business owners, professionals, corporate executives and those with independent resources.

Account Minimums

Haviland & Sams does not require a minimum account size for opening or maintaining accounts.

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

Methods of Analysis and Investment Strategies

Haviland & Sams acts as a strategist for the client, and rather than recommending specific securities investments, Haviland & Sams, LLC provides its clients with an investment strategy, asset allocation advice, and recommends the use of investment managers to determine specific investments to meet their strategy.

Haviland & Sams does not engage in analysis of publicly or individually traded securities. Haviland & Sams does not recommend specific individual securities or fixed income instruments.

Haviland & Sams provides analysis and screening of mutual funds and makes recommendations to clients allocating a portfolio of mutual funds. Haviland & Sams utilizes Morningstar software to guide in the analysis of funds.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each investment advisory client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Independent Investment Manager Search and Monitoring clients should review the disclosure documents of recommended independent managers for information on the methods of analysis, sources of information and investment strategies used by these advisers.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. Haviland & Sams' 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 prices 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 next year will not buy as much as a dollar today, 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 economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders 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.

Haviland & Sams reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. Haviland & Sams may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the client's evaluation of Haviland & Sams or the integrity of Haviland & Sams' management. There are no material disciplinary events to disclose.

For Massachusetts Residents: Massachusetts law requires disclosure that information on disciplinary history and the registration of Haviland & Sams, LLC and its associated persons may be obtained by contacting the Public Reference Branch of the Securities and Exchange Commission at (202) 942-8090. Disciplinary history may also be obtained from the Massachusetts Securities Division at (617) 727-3548, and if asked, Haviland & Sams, LLC and its associated persons must also disclose the history. No disciplinary history exists for Haviland & Sams, LLC and/or its owners or employees.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

Haviland & Sams is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither Haviland & Sams nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Neither Haviland & Sams nor any of its management persons have a material relationship or arrangement with any related person or financial industry entities.

Other Investment Managers

Haviland & Sams recommends the selection of other investment managers for its clients. Haviland & Sams receives compensation for Independent Investment Manager Search and Monitoring Services, as disclosed in Item 5.

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

Code of Ethics

Haviland & Sams' employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Benjamin B. Sams, Owner, Advisor-Managing Principal and Chief Compliance Officer, reviews all employee trades each quarter. His trades are reviewed by Divina W. Marcktell, Manager – Client Services.

Haviland & Sams' employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of Haviland & Sams' Code of Ethics by contacting Benjamin B. Sams at 860.678.1414.

Participation or Interest in Client Transactions – Personal Securities Transactions

Haviland & Sams or individuals associated with Haviland & Sams may use the same independent investment managers recommended to clients for their own accounts. Haviland & Sams or its related persons may, therefore, have an interest or position in a certain security or securities which may also be recommended by a recommended independent investment manager to a client. These individuals have no knowledge of transactions to be made by any recommended adviser for any client prior to the transactions.

The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of Haviland & Sams will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Haviland & Sams' clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might

benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics and designed to reasonably prevent conflicts of interest between Haviland & Sams and its clients.

Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross

Haviland & Sams and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

It is Haviland & Sams' policy that the Firm will not participate in any principal or agency cross securities transactions for client accounts. Haviland & Sams will also not transact cross trades between client accounts.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

Haviland & Sams does not receive formal soft dollar benefits.

Brokerage for Client Referrals

Haviland & Sams does not receive client referrals from broker/dealers.

Directed Brokerage

Haviland & Sams, LLC does not recommend brokers to clients; rather, it recommends independent investment managers to manage the client's portfolio. These Independent Managers each have separate brokerage practices as described in their respective Form(s) ADV Part 2. Clients should refer to those disclosures for brokerage direction policies. Independent Managers typically use Schwab Institutional, Pershing LLC, and Fidelity Investments to broker and custody client transactions.

Trade Aggregation

Haviland & Sams does not trade on behalf of client accounts.

Item 13: Review of Accounts

Reviews

Client accounts are monitored regularly and are reviewed not less than quarterly. Benjamin B. Sams, Owner, Advisor-Managing Principal and Chief Compliance Officer, and Divina W. Marcktell, Manager – Client Services conduct account reviews.

Independent Investment Manager Search and Monitoring clients should refer to the disclosure documents of recommended managers and, if appropriate, the Form ADV Part 2A Appendix 1 – Wrap Fee Program Brochure of the separate account management program sponsor for information on reviews of client accounts.

Review Triggers

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

Reporting

Haviland & Sams on a limited basis provides reports to its Wealth Management Services clients. However, Wealth Management Services include regularly scheduled meetings with the client. Independent Investment Manager Search and Monitoring clients receive quarterly performance reports.

All clients receive regular statements from their custodian, advisor, and/or independent investment manager.

Item 14: Client Referrals and Other Compensation

Other Compensation

Haviland & Sams does not receive any economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

Other Compensation – Brokerage Arrangements

See disclosure in Item 12 regarding compensation, and other brokerage arrangements used in connection with giving advice to clients.

Compensation – Client Referrals

Haviland & Sams does not make or accept referral fees from other professionals when a prospect or client is referred to them.

Item 15: Custody

Custody – Fee Debiting

Clients may authorize Haviland & Sams (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and Haviland & Sams. The custodian is advised in writing of the limitation of Haviland & Sams' access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Haviland & Sams.

Custody – Trusteeship/Executor

Haviland & Sams or a related person acts as a co-trustee for one client's trust accounts and is the sole Independent Trustee. Haviland & Sams complies with State of Connecticut's Custody Rule with regard to the custody of the trust; qualified custodians and independent investment managers send regular statements directly to the client which identify the amount of funds and the amount of each security in the account at the end of the period, as well as all transactions in the account during that period.

In addition, the trust agreement states that both co-trustees participate in and agree to all investment decisions. The trust agreement also appoints another individual as a Trust Protector. The Trust Protector has the power to remove the Independent Trustee and appoint a successor.

Custody – Account Statements

As described above and in Item 13, clients receive at least quarterly statements from the qualified custodian or independent investment managers that hold and maintain client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to reports that Haviland & Sams may provide.

Item 16: Investment Discretion

Haviland & Sams does not accept discretionary authority to manage accounts.

Item 17: Voting Client Securities

Haviland & Sams does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies; clients receive these proxies directly from either custodians or transfer agents.

The underlying independent investment managers vote proxies on behalf of clients.

On a limited basis Haviland & Sams prepares class action claims on behalf of clients.

If requested, Haviland & Sams may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Benjamin B. Sams at 860.678.1414 for information about proxy voting.

Item 18: Financial Information

Haviland & Sams has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Haviland & Sams is not required to provide a balance sheet; Haviland & Sams does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client and six months or more in advance.

Item 19: Requirements for State Registered Advisors

Management Background

See response to Form ADV Part 2B – Investment Adviser Brochure Supplement.

Other Business

See response to Item 10 – Other Financial Industry Activities and Affiliations.

Performance-Based Fees

Neither Haviland & Sams nor any supervised persons are compensated by performance-based fees.

Disciplinary Disclosures

See response to Item 9 – Disciplinary Information.

Issuer of Securities

Neither Haviland & Sams nor any management persons have any relationships or arrangements with any issuer of securities.

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**Form ADV Part 2B
Investment Adviser Brochure Supplement**

Supervisor: Benjamin B. Sams

Supervisor of:
Divina W. Marcktell

August 2020

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Haviland & Sams, LLC's brochure. You should have received a copy of that brochure. Please contact Benjamin B. Sams, Owner, Advisor - Managing Principal and Chief Compliance Officer at 860.678.1414 or bsams@havalandsams.com if you did not receive Haviland & Sams, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

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Educational Background and Business Experience

Education and Business Background

Advisory persons associated with Haviland & Sams, LLC must possess, minimally, a college degree and/or appropriate business experience and any required licenses.

Supervised Persons

Benjamin B. Sams

Year of Birth: 1974

CRD# 2858844

Education:

Graduated from Connecticut College with a BA in History and BA in Government and graduated from The American College with a MS in Financial Services.

Employment History:

Haviland & Sams, LLC Owner, Advisor - Managing Principal and Chief Compliance Officer	2015 to Present
Haviland & Sams, LLC Member/Managing Principal, Chief Compliance Officer	2010 to 2014
The Haviland Group, LLC Managing Principal	2006 to 2010
New York Life Insurance and Annuity Corporation Agent	1997 to 2006
New York Life Securities, Inc. Registered Representative	1997 to 2006

Divina W. Marckett

Year of Birth: 1969

CRD# 6341056

Education:

Graduated from the University of the Philippines with a BS in Business Administration and graduated from the Culinary Institute of America with an AOS in Culinary Arts.

Employment History:

Haviland & Sams, LLC Manager- Client Services	2012 to Present
Homemaker	2006 to 2012

Branded Concept Development Project Manager	2003 to 2006
ROC Corp. Director of Franchise Administration	2003
HotelRevMax Assistant Director of Sales and Marketing	2001 to 2002

Disciplinary Information

Neither Haviland & Sams nor any Supervised Persons have any material disciplinary events to disclose.

For more information on Investment Adviser Representatives, you may visit the Investment Adviser Public Disclosure (IAPD) website at www.adviserinfo.sec.gov.

Other Business Activities

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither Haviland & Sams nor any Supervised Persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

Supervision

Benjamin B. Sams, Owner, Advisor-Managing Principal and Chief Compliance Officer, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Benjamin B. Sams supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, Benjamin B. Sams regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Benjamin B. Sams may be reached at 860.678.1414.

Requirements for State Registered Advisers

Information on Disciplinary History is disclosed above and in Form ADV Part 2A – Item 9. No Supervised Person has been the subject of a bankruptcy petition.