Item 1: Cover Page

Form ADV Part 2A
Investment Adviser Brochure

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July 2026

This Brochure provides information about the qualifications and business practices of Haviland & Sams, LLC ("we," "us," "our,"). 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@havilandsams.com.

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

We are a registered investment adviser. Please note that use of the term "registered investment advisor" and a description of the Firm and/or our employees as "registered" does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

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.

Material Changes since the Last Update

Since the last Annual Amendment filing on March 24, 2025, the Firm has no material changes to report.

Full Brochure Available

Haviland & Sams's 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.

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

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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 May 2003 in Farmington, Connecticut 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 investment manager platform programs: Schwab Institutional, CRD #: 5393, and BNY Mellon Advisors, CRD #: 106108.

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. To clarify, this practice is incidental to two clients. Any informational sessions are done only at the request of the client; this is a service the firm provides strictly to discuss the two 401(k) plans among the plan participants and these discussions do not take on the tone of a seminar or a workshop. 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

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act, ("ERISA") and/or the Internal Revenue Code, ("IRC"), as applicable, which are laws governing retirement accounts.

We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We must take into consideration each client's objectives and act in the best interests of the client. We are prohibited from engaging in any activity that is in conflict with the interests of the client. We have 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 a 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.

Regulations prohibit us from:

- Employing any device, scheme, or artifice to defraud a client;
- Making any untrue statement of a material fact to a client or omitting to state a material fact when communicating with a client;

- Engaging in any act, practice, or course of business which operates or would operate as fraud or deceit upon a client; or
- Engaging in any manipulative act or practice with a client.

We will act with competence, dignity, integrity, and in an ethical manner, when working with clients. We will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, promoting our services, and engaging in other professional activities.

Wrap Fee Programs

Haviland & Sams may recommend wrap fee programs offered by BNY Mellon Advisors, Inc. (BNYA), formerly known as Lockwood Advisors, Inc., CRD #: 106108. Haviland & Sams receives a portion of the total wrap fee for its portfolio supervisory services. More details on these programs may be found in each program's Form ADV Part 2A Appendix 1, which is available directly from BNYA.

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 $3,500 - $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, which 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 $500. 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 pays 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 $3,500 - $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.

Cash Balances

Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to pay fees or to provide for asset protection during periods of volatile market conditions. Your cash and cash equivalents will be subject to our investment advisory fees unless otherwise agreed upon. You may experience negative performance on the cash portion of your portfolio if the investment advisory fees charged are higher than the returns you receive from your cash.

Retirement Plan Rollover Recommendations

As part of our investment advisory services to our clients, we may recommend that clients roll assets from their employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a SIMPLE IRA, SEP IRA, Traditional IRA, or Roth IRA (collectively, an "IRA Account") that we will advise on the client's behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts.

The firm may recommend a rollover into an IRA after appropriate analysis and comparison of fees and services, including a thorough review of each client's circumstances and review of all relevant options. The assets, if rolled into an IRA that is subject to our advisement, would be charged a Wealth Management fee or Independent Investment Manager Search and Monitoring fee as disclosed above. The fee set is based on the complexity of the client's circumstances. If the client chooses to rollover the assets, they are not charged more just because the firm makes the recommendation. However, this creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to the client (i.e., receipt of additional fee-based compensation). Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, clients are under no obligation to have the assets in an IRA advised on by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in our clients' best interests and not put our interests ahead of our clients.'

Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice);
- never put our financial interests ahead of our clients' interests when making recommendations (give loyal advice);
- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in our clients' best interests;
- charge no more than a reasonable fee for our services; and
- give clients basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, clients should consider the costs and benefits of a rollover. Note that an employee will typically have four options in this situation:

1. leaving the funds in the employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. cashing out and taking a taxable distribution from the plan; or
4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide clients with an explanation of the advantages and disadvantages of both account types and document the basis for our belief that the rollover transaction we recommend is in your best interests.

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. Independent Investment Managers may have their own requirements on a minimum account size to manage.

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 ETFs and makes recommendations to clients allocating a portfolio of mutual funds and/or ETFs when appropriate. 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 investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. 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 times. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Cybersecurity Risk:** Though Haviland & Sams takes a focused and strong approach to protecting client's privacy and security, not all cyber breaches can be avoided. A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk**: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.
- **Custodial Risk:** This risk is the probability that a party to a transaction will be unable or unwilling to fulfill its contractual obligations either due to technological errors, control failures, malfeasance, or potential regulatory liabilities.

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 are 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. Haviland & Sams will provide a copy of the Code upon request.

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 the 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.

Compensation – Client Referrals

Haviland & Sams has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees, and other similar sources. Haviland & Sams does not compensate referring parties for these referrals.

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 (State of Connecticut Custody Regulation 36b-31-5b) 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

Proxy Voting

Haviland & Sams does not have any authority to and does not vote proxies on behalf of clients, nor does the Firm make any express or implied recommendation with respect to voting proxies. Clients retain the sole responsibility for receiving and voting proxies that they receive directly from either their custodian or transfer agents. Clients may contact Haviland & Sams for information about proxy voting.

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.

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.

Form ADV Part 2B – Investment Advisor Brochure Supplement

Form ADV Part 2B
Investment Advisor Brochure Supplement

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Benjamin B. Sams
CRD #: 2858844

July 2026

This Brochure Supplement provides information about the Firm's ("we," "us," "our") employees that supplements our 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@havilandsams.com if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above 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 employee.

Item 2: Educational Background and Business Experience

We generally require that employees involved in making investment decisions and providing investment advice have a college degree and/or significant experience in the investment management or financial services industries.

Benjamin B. Sams Born 1974
CRD #: 2858844

Business Background:

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

Formal Education after High School:
The American College
Master of Science in Financial Services

Connecticut College
Bachelor of Arts in History
Bachelor of Arts in Government

Item 3: Disciplinary Information

Benjamin B. Sams has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Other Business Activities

Benjamin B. Sams does not have any disclosable outside business activities.

Disclosure on Fees and Compensation is provided in Form ADV Part 2A Item 5 – Fees and Compensation. Benjamin B. Sams does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5: Additional Compensation

Benjamin B. Sams does not receive any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals, or new accounts.

Item 6: 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.

Item 7: Requirements for State Registered Advisers

Benjamin B. Sams has not been involved in any activities resulting in a disciplinary disclosure. Benjamin B. Sams has not been the subject of a bankruptcy petition.

Form ADV Part 2B
Investment Advisor Brochure Supplement

30 Stanford Drive, 2nd Floor
Farmington, CT 06032
(860) 678-1414
www.havilandsams.com

Divina W. Marcktell
CRD #: 6341056

July 2026

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Additional information about our employee(s) referenced above 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 employee.

Item 2: Educational Background and Business Experience

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Divina W. Marcktell — Born 1969
CRD #: 6341056

Business Background:

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

Formal Education after High School:
University of the Philippines
Bachelor of Science in Business Administration

Culinary Institute of America
Associate of Occupational Studies in Culinary Arts

Item 3: Disciplinary Information

Divina W. Marcktell has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Other Business Activities

Divina W. Marcktell is engaged in real estate activity.

This outside business activity does not create a material conflict of interest with clients.

Disclosure on Fees and Compensation is provided in Form ADV Part 2A Item 5 – Fees and Compensation. Divina W. Marcktell does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5: Additional Compensation

Divina W. Marcktell does not receive any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals, or new accounts.

Item 6: Supervision

Benjamin B. Sams, Owner, Advisor-Managing Principal and Chief Compliance Officer, supervises the person named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Benjamin B. Sams supervises this person 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.

Item 7: Requirements for State Registered Advisers

Divina W. Marcktell has not been involved in any activities resulting in a disciplinary disclosure. Divina W. Marcktell has not been the subject of a bankruptcy petition.

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Cathleen P. Keane
CRD #: 7084786

July 2026

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Additional information about our employee(s) referenced above 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 employee.

Item 2: Educational Background and Business Experience

We generally require that employees involved in making investment decisions and providing investment advice have a college degree and/or significant experience in the investment management or financial services industries.

Cathleen P. Keane Born 1970
CRD #: 7084786

Business Background:

Haviland & Sams, LLC 2026 to Present
Financial Advisor

Cathleen Keane 2025 to 2026
CERTIFIED FINANCIAL PLANNER®

Morgan Stanley 2024 to 2025
Client Service Representative

Fidelity Investments 2019 to 2022
Financial Consultant

Formal Education after High School:
University at Buffalo
Bachelor of Science in Business Administration

Professional Designations:
CERTIFIED FINANCIAL PLANNER® (CFP®)

Professional Certifications

Cathleen P. Keane maintains a professional designation, which requires the following minimum requirements:

	CERTIFIED FINANCIAL PLANNER® (CFP®)
Issued By	Certified Financial Planner Board of Standards, Inc.
Prerequisites	Candidate must meet the following requirements: • A bachelor's degree (or higher) from an accredited college or university, and • 3 years of full-time personal financial planning experience
Education Requirements	Candidate must complete a CFP®-board registered program, or hold one of the following: • CPA

	• ChFC® • Chartered Life Underwriter® (CLU®) • CFA® • Certified Investment Management Analyst® (CIMA®) • Ph.D. in financial planning, finance, business administration, or economics • Doctor of Business Administration • Attorney's License
Exam Type	CFP® Certification Examination
Continuing Education Requirements	40 hours every 2 years (38 hours general CE, 2 hours CFP Board Ethics

Item 3: Disciplinary Information

Cathleen P. Keane has not been involved in any activities resulting in a disciplinary disclosure.

Item 4: Other Business Activities

Cathleen P. Keane is a registered insurance agent. However, she does not sell any insurance for the Firm or for any insurance agency and is not actively engaged in selling insurance. There is no business relationship between her role as an insurance agent and the advisory business of the Firm. Additionally, there are no material conflicts of interest created by her role as an insurance agent, as she is not actively engaged in selling insurance.

Disclosure on Fees and Compensation is provided in Form ADV Part 2A Item 5 – Fees and Compensation. Cathleen P. Keane does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5: Additional Compensation

Cathleen P. Keane does not receive any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals, or new accounts.

Item 6: Supervision

Benjamin B. Sams, Owner, Advisor-Managing Principal and Chief Compliance Officer, supervises the person named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Benjamin B. Sams supervises this person 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.

Item 7: Requirements for State Registered Advisers

Cathleen P. Keane has not been involved in any activities resulting in a disciplinary disclosure.
Cathleen P. Keane has not been the subject of a bankruptcy petition.