

April 29, 2022

Re: 2022 Fairway Master Disclosure

Dear Fairway Investor:

We hope this letter finds you safe and healthy. We would like to take this opportunity to provide you with important information about our company. As an investment adviser registered with the SEC, we are required to provide you with certain disclosure information on an annual basis, called the Master Disclosure.

Since Fairway’s last ADV Part 2 (“Brochure”) dated February 3, 2021, there have been some material changes. Fairway America Investment Advisors (“FAIA”) has started advising one new client—Fairway Bamboo GP Fund LLC. Fairway also started the process of winding down Fairway America Fund VI LLC and expects to complete that process in 2022 or 2023. Also, with the approval of limited partner investors holding more than 60% of the units in each Fund, the general partner of Fairway America Fund VII LP (“Fund VII”) and Fairway America Fund VIIQP, LP (“Fund VIIQP”) has made a number of changes to those Funds. Among other things, payments of any portion of the Excess Distributable Cash (“EDC”) previously payable to FAIA by Fund VII and Fund VIIQP have been eliminated, along with the preferred return structure tied to FAIA’s right to receive a share of EDC, the management fee for those two Funds has been increased from 1.5% to 2.0% of each Fund’s total assets under management, the capital raise fee payable by those two Funds has been reduced, and each Fund has added an onboarding fee. Fund VIIQP’s investment mandate has also been slightly modified to allow that Fund to focus more on overall returns, while still attempting to generate reasonable quarterly cash flows. Fairway America Capital Markets Group LLC has also engaged registered representatives Rich and George Matyas through North Capital Private Securities Corporation to raise capital for the Funds that FAIA advises. Each of these changes is discussed in detail in the March 31, 2022 Brochure, enclosed.

The following documents, constituting the 2022 Fairway Master Disclosure, can be accessed by clicking the embedded link:

1. [Fairway’s current Brochure](#)
2. [Fairway’s 2022 Privacy Policy and Notice](#)
3. [Fairway’s 2022 Proxy Voting and Class Action Policy](#)

Fairway’s Privacy Policy has also been updated to include, among other things, a description of how Fairway shares investor data with non-affiliated third parties in an effort to create efficiencies in marketing efforts.

These documents have also been uploaded under the “Compliance Documents” tab on each Fairway Fund page on fairwayamerica.com. You must be logged in to your account on fairwayamerica.com to view the documents there. For help accessing your fairwayamerica.com account, contact Sarah Gales at sarah.gales@fairwayamerica.com.

Thank you for your investment and your trust. If you have any questions or concerns, please feel free to contact me directly at mike.holman@fairwayamerica.com.

All the best,

/s/

Michael Holman
Chief Compliance Officer
Fairway America Investment Advisors, LLC