Part 2A of Form ADV: Firm Brochure

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This brochure provides information about the qualifications and business practices of Legacy Financial Strategies, LLC ("Legacy", "the Firm", or "We"). If you have any questions about the contents of this brochure, please contact Heather Hardman at (913) 403-0600 or one of the email addresses listed above. 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.

Legacy Financial Strategies, LLC is a registered investment advisor with the United States Securities and Exchange Commission. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information about which you determine to hire or retain an advisor.

Additional information about Legacy Financial Strategies, LLC also is available on the Securities and Exchange Commission's website at www.adviserinfo.sec.gov.

Item 1 Cover Page

Please refer to previous page.

Item 2 Material Changes

This Brochure dated March 23, 2022, represents the annual amendment to the Brochure for Legacy Financial Strategies, LLC. The Brochure is prepared in accordance with the requirements and rules adopted by the United States Securities and Exchange Commission ("SEC"). Part 2A of Form ADV requires investment advisers to provide narrative, plain English disclosures regarding their advisory business in order to provide Clients and prospective Clients with more meaningful information about the adviser and its business practices.

Since the filing of the firm's annual update Brochure on March 15, 2021, we have made various minor updates but no material changes were made to the Brochure.

Because of the amount of detail provided within the brochure, Legacy encourages each Client to read this brochure carefully and to contact us with any questions you may have.

Pursuant to SEC requirements, Legacy will ensure that Clients receive a summary of any material changes to this Brochure within 120 days of the close of Legacy's fiscal year, along with a copy of this Brochure or an offer to provide the Brochure. Additionally, as Legacy experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover. Legacy's Brochure is available anytime upon request or at the SEC's website at www.adviserinfo.sec.gov.

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Item 4 Advisory Business

Firm Description and Principal Owner

Legacy was established in May of 2000, resides, and is an advisory firm registered with the Securities and Exchange Commission ("SEC"). Legacy's majority ownership is held in trust by The Michael W. Lutz Irrevocable Trust. This trust was created pursuant to the provisions of Section 456.5-505, Revised Statutes of Missouri, as amended from time to time, with the intent that this trust is a Missouri self-elected spendthrift trust.

Types of Services Offered by Legacy

A. Investment Management Services

Legacy ("the Advisor") provides investment advisory services to its clients on a discretionary and non-discretionary basis. As of December 31, 2021, Legacy's assets under management totaled $527,425,037. Of this total, $408,392,807 was managed on a discretionary basis and $119,032,230 was managed on a non-discretionary basis.

The advisory services include, among other things, providing advice regarding asset allocation and the selection of investments. Account management is guided by the stated objectives of the client. In addition, Legacy considers the client's risk profile and financial status prior to making any recommendations.

In accordance with Rule 204-3 under the Investment Advisers Act of 1940, Legacy will provide a disclosure brochure (ADV Part 2A) and any brochure supplements (ADV Part(s) 2B) to each client or prospective client prior to or at the time of signing an investment advisory agreement.

The client has the authority to request restrictions or limitations on investments of specific securities or specific types of securities. This request can be made directly to the Advisor in writing.

Because Legacy is a registered investment adviser, we are required to meet certain fiduciary standards when providing investment advice to clients. Additionally, when we provide investment advice related to a retirement plan account or an individual retirement account, we are considered fiduciaries 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. As such, we are required to act in your best interest and not put our interest ahead of yours, even though our compensation creates some conflicts with your interests in that the more you have us manage, the more we can earn. Our clients however are under no obligation to use services recommended by our associated persons. Furthermore, we believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

B. Selection of Portfolio Managers

For certain clients, Legacy will recommend the active discretionary management of all or part of a discretionary client's assets in their account to one or more portfolio managers based on the client's stated objectives and restrictions. Access to these managers will be provided by Legacy through a third party custodial platform of approved portfolio managers. The portfolio managers will have discretionary authority over those assets allocated to them for management and they will be authorized to buy, sell, and trade in securities in accordance with the client's investment objectives. Legacy continues to monitor the selected portfolio manager to ensure they adhere to the philosophy and investment style for which they were selected.

C. Retirement Plan Services

Legacy provides retirement plan services to business clients on a non-discretionary basis. These services include plan setup, investment selection, and ongoing support services.

These services include:

I. Fiduciary Services: The Advisor will perform the following services, referred to as "Fiduciary Services":

a. Advisor shall provide non-discretionary investment advice to Client about investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client shall have the final decision-making authority regarding the initial selection, retention, and removal of investment options.

b. Assist in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan and shall set forth the asset classes and investment categories to be offered under the Plan, as well as the criteria and standards for selecting and monitoring the investments. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt the investment policy statement.

c. Prepare periodic investment advisory reports that document consistency of fund management and performance to the guidelines set forth in the IPS and make recommendations to maintain or remove and replace investment options.

d. Meet with Client on a periodic basis to discuss reports and recommendations.

e. Provide investment advice to the Client with respect to the selection of a qualified default investment alternative ("QDIA") for participants who fail to make an investment election.

II. Non-Fiduciary Services: The Advisor will also perform the following services, referred to as "Non-Fiduciary Services":

a. Assist in the education of the participants in the Plan about general investing principles and the investment alternatives available under the Plan in accordance with Department of Labor Interpretive Bulletin 96-1.

b. Assist in the group enrollment meetings to explain retirement plan participation, savings and investing for eligible employees.

c. Organize participant education meetings as requested by the plan sponsor or as regularly scheduled; can differ per plan.

Plan sponsors of retirement plans such as 401(k), 403(b), or other employer plans are not required to use Legacy's custodians and can appoint a custodian of their choosing.

D. Financial Planning/Consulting Services

Legacy provides financial planning, consulting and plan update services to individuals and businesses. Legacy also provides non-securities advice on topics that include but are not limited to business, retirement, estate, budgetary, college, personal, and business tax planning.

E. Legacy Next Investment and Financial Forecasting Program

Legacy Next portfolios are comprised of ETFs exclusively chosen by our investment committee based on their performance, expenses, and exposure to asset classes. There are 30 different portfolio models that take a client's tax status and risk tolerance into account. Risk tolerance is measured through a questionnaire developed by Schwab which is completed prior to account opening, and other communication with client. Accounts are rebalanced regularly to reflect changes in allocation percentages due to market fluctuation or cash movement into or out of account. There are currently no transaction costs charged by Schwab on the Institutional Intelligent Portfolios platform so rebalancing even by small percentage changes does not impact

cost. The goal of the Legacy Next portfolios is to allow clients access to Legacy Financial Strategies, LLC's investment committee research, experience, and portfolio construction through a platform that is cost efficient for accounts holding balances under $250,000 while utilizing professional portfolio management. The eMoney Advisor product from eMoney Advisor, LLC will be utilized as an asset aggregation and financial forecasting tool that to compliments the portfolio management portion of the program.

F. Selection of Private Offerings, Limited Partnerships, and Alternative Investments

In addition to advising clients on suitable, publicly traded investments, Legacy advises clients on appropriate interests in limited partnerships or private offerings in the real estate sector. Promoting diversification of investments is important to our strategy and non-traditional investments can act to complement conventional equity and fixed income portfolios for qualified, accredited clients. Real Estate investments can include income producing and value-added properties identified on an opportunistic basis.

Item 5 Fees and Compensation

A. Fees for Investment Management Services

Legacy has several custodians in which our clients can chose to do business with. We utilize Charles Schwab & Co., Inc. ("Schwab") and Fidelity Investments ("Fidelity"), both of which are FINRA registered broker-dealers and members of SIPC. SEI Investment Company/SEI Private Trust Corporation/SEI Investments Management Corporation ("SEI") is a limited purpose federal savings association. We are independently owned and operated and are not affiliated with Schwab, SEI, Fidelity, or American Funds.

Legacy charges fees based on a percent of assets under management or a fixed fee. Specific fees charged by Legacy are will be set forth in each client's investment advisory agreement with Legacy. Legacy has the discretion and authority to negotiate fees based upon the complexity and unique needs of the client. Legacy does not aggregate account values in a household for purposes of calculating fees in a tiered structure, unless by the Firm's discretion or otherwise negotiated. Either party has the authority to terminate the agreement with 30 days' written notice.

I. Schwab Custodial Accounts

Advisory fees are billed quarterly in advance. Fees are calculated using an average daily balance method using the tiered investment fee schedule referenced below or an agreed upon fee. The average daily balance for each account is determined by calculating the total dollar value for every calendar day during the quarter. All account balances for the quarter are then added together and divided by the number of days in the quarter. The fee is then calculated by multiplying the average daily balance of the account by the percentage in the tiered investment fee schedule.

Assets Under Management	Annual Rate
First $250,000	1.75%
Next $500,000	1.25%
Next $1,750,000	1.00%
Over $2,500,000	0.75%

Should the client open or add to an account during a quarter, the fee will be prorated based on the number of days that the Account was open during the quarter and billed in arrears for the partial quarter based on the balance at the beginning of the partial quarter. An advisory client will have a period of five (5) business days from the date of signing the investment management agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party has the authority to terminate the agreement with 30 days' written notice. Upon termination of the Firm's services, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client.

The account custodian can charge fees, which are in addition to and separate from the investment advisory service fee. The custodian can also charge accounts for various transaction costs, retirement plan, and administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12b-1 fees. Mutual funds have annual expenses as described in each fund's prospectus. Advisory clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

II. SEI Custodial Accounts

Advisory fees are paid quarterly in arrears. Fees are calculated based on the account's asset value as of the last business day of the prior calendar quarter using the following tiered investment fee schedule or an agreed upon fee.

From	To	Per Year
$0	$250,000	Up to 1.25%
$250,001	$500,000	Up to 1.15%
$500,001	$1,000,000	Up to 1.05%
$1,000,001	$2,000,000	Up to 0.95%
$2,000,001	$3,000,000	Up to 0.75%
Over $3,000,001		0.60%

An advisory client will have a period of five (5) business days from the date of signing the investment management agreement to unconditionally rescind the agreement. Thereafter, either party has the authority to terminate the agreement with 30 days' written notice. Upon termination, no fees will be refunded, as fees are paid quarterly in arrears by the client. The client account will be charged the assigned fee for the number of days the account is open in the quarter prior to termination.

The account custodian can charge fees, which are in addition to and separate from the investment advisory service fee. The custodian can also charge accounts for various transaction costs, retirement plan, and administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12b-1 fees. Mutual funds have annual expenses as described in each fund's prospectus. Advisory clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

III. SEI Managed Account Portfolios

As described in Item 4, clients have a choice to use services such as Portfolio Managers, which are offered on behalf of SEI Investments. These fees are called "Manager Strategy Fees" and are charged quarterly in arrears. They are paid directly from the client custodial account to the selected management firm or individual selected to manage the client funds. The fee charged is based on an account's asset value on the last day of the prior quarter and paid quarterly in arrears. Each fee structure is different dependent upon the selected investment strategy and portfolio advisor. The client can incur additional costs or charges associated with transactions, transfers, or wires.

SEI Fee breakpoint levels are determined based on an Investor's total Account assets invested in an Investment Style categorized within the same investment style description groupings/fee rate schedules listed below. By way of example only, if an Account is invested in two Investment Styles, the first being a model classified as a Small Cap style and a second model classified as a Small-Mid Cap style, the Account assets invested in those two Investment Styles will be combined for purposes of determining the applicable breakpoint levels for purposes of calculating the fees. Breakpoints are not applied across the style description groupings/fee rate schedules. By way of example only, if an Account is invested in an Investment Style classified as a Small Cap style as well as in a second Investment Style classified as an Alternative Income style, those Account assets will not be combined for purposes of determining the applicable breakpoint level for calculating SEI Fees, but assets allocated to each such Investment Style will be considered individually in determining fees.

The maximum SEI Fee a client will pay for managed account services is 1.25%. Additionally, for ETF Strategies accounts, SEI charges a maximum Program Fee of 0.20% for providing administrative and recordkeeping services and other services to accounts invested this program. The fee is calculated and paid to SEI quarterly in arrears. SEI will deduct the Program Fee directly from the Client's custody account. Client will also pay firms Advisory Fees as indicated on the account application. The following applies to accounts that were opened after 2012. Please refer to SEI publications for accounts opened prior to 2012.

Investment Style	Breakpoints	SEI Fee
All Cap, Alternative-Multi-Strategy SMA, Equity Income, Global Equity, International Developed Markets, Large Cap, Managed Volatility, Mid Cap, Socially Responsible Investing, Windham ETF Strategies	first $500,000 next $500,000 next $1 million next $3 million next $5 million over $10 million	0.90% 0.85% 0.80% 0.75% 0.70% 0.65%
Small Cap, Small-Mid Cap, REIT	first $500,000 next $500,000 next $1 million next $3 million next $5 million over $10 million	1.10% 1.05% 1.00% 0.95% 0.90% 0.85%
International Emerging Markets	first $500,000 next $500,000 next $1 million next $3 million next $5 million over $10 million	1.25% 1.20% 1.15% 1.10% 1.05% 1.00%
Alternative-Income, Alternative-Tax Advantage Income, Alternative-MLP, Core Aggregate, Core Aggregate Plus, Government/Corporate Bond, Government Securities, Municipal Fixed Income, Preferred Securities	first $500,000 next $500,000 next $1 million next $3 million next $5 million over $10 million	0.65% 0.60% 0.56% 0.54% 0.50% 0.45%
SEI ETF Strategies	first $500,000 next $500,000 next $1 million next $3 million next $5 million over $10 million	0.55% 0.35% 0.30% 0.25% 0.22% 0.20%
SEI Fixed Income Strategies	first $500,000 next $500,000 next $1 million next $3 million next $5 million over $10 million	0.30% 0.27% 0.25% 0.20% 0.19% 0.18%
SEI Factor Based Strategies	first $500,000 next $500,000 next $1 million next $3 million next $5 million over $10 million	0.55% 0.35% 0.30% 0.25% 0.22% 0.20%
Tax Management	**SEI Fee**	
Tax Management	0.10% in addition to the SEI Fee described above	

IV. Fidelity Investments Custody

Advisory fees are due quarterly in advance. Fees are calculated using an average daily balance method using the tiered investment fee schedule referenced below or an agreed upon fee. The average daily balance for each account is determined by calculating the total dollar value for every calendar day during the quarter. All account balances for the quarter are then added together and divided by the number of days in the quarter. The fee is then calculated by multiplying the average daily balance of the account by the percentage in the tiered investment fee schedule.

Assets Under Management	Annual Rate
First $250,000	1.75%
Next $500,000	1.25%
Next $1,750,000	1.00%
Over $2,500,000	0.75%

Should the client open or add to an account during a quarter, the fee will be prorated based on the number of days that the Account was open during the quarter and billed in arrears for the partial quarter based on the balance at the beginning of the partial quarter. An advisory client will have a period of five (5) business days from the date of signing the investment management agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party has the authority to terminate the agreement with 30 days' written notice. Upon termination of the Firm's services, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client.

The account custodian can charge fees, which are in addition to and separate from the investment advisory service fee. The custodian can also charge accounts for various transaction costs, retirement plan, and administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12b-1 fees. Mutual funds have annual expenses as described in each fund's prospectus. Advisory clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

V. American Funds, Learning Quest, and Missouri MOST Custodial Accounts

Advisory fees are calculated and paid quarterly in advance. Fees are calculated based on the account's period ending asset value as of the last business day of the prior calendar quarter using the tiered annualized investment fee schedule specified below or an agreed upon fee.

From	To	Per Year
$0	$250,000	Up to 1.75%
$250,001	$750,000	Up to 1.25%
$750,001	$2,500,000	Up to 1.00%
Over $2,500,000		Up to 0.75%

An advisory client will have a period of five (5) business days from the date of signing the investment management agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party has the authority to terminate the agreement with 30 days' written notice. Upon termination of the Firm's services, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client.

The account custodian can charge fees, which are in addition to and separate from the investment advisory service fee. The custodian can also charge accounts for various transaction costs, program management, retirement plan, and administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12b-1 fees. Mutual funds may have annual expenses as described in each fund's prospectus. Advisory clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

VI. 401k and Annuities (assets not held with one of our preferred custodians):

Fees are calculated based on the account's asset value as of the last business day of the prior calendar quarter using the following tiered investment fee schedule or an agreed upon fee.

From	To	Per Year
$0	$250,000	Up to 1.75%
$250,001	$750,000	Up to 1.25%
$750,001	$2,500,000	Up to 1.00%
Over $2,500,000		Up to 0.75%

An advisory client will have a period of five (5) business days from the date of signing the investment management agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party has the authority to terminate the agreement with 30 days' written notice. Upon termination of the Firm's services, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client.

The account custodian can charge fees, which are in addition to and separate from the investment advisory service fee. The custodian can also charge accounts for various transaction costs, retirement plan, and administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12b-1 fees. Mutual funds have annual expenses as described in each fund's prospectus. Advisory clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

VII. Fees for Retirement Plan Services

Monthly Billing: The fee associated with retirement plan services is determined on a negotiated basis between Legacy, the client, and associated third parties. Fees are due monthly in advance. Fees are due on the first day of the calendar month and are billed directly to the client. Fees are based on the account's asset value as of the last business day of the prior calendar month and are prorated for accounts opened during the month.

Quarterly Billing: The fee associated with retirement plan services is determined on a negotiated basis between Legacy, the client, and associated third parties. Fees are due quarterly in advance. Fees are due on the first day of the calendar quarter and are billed directly to the client. Fees are based on the account's asset value as of the last business day of the prior calendar quarter.

Either party has the authority to terminate the agreement with 30 days' written notice.

Associated third parties can charge fees, which are in addition to and separate from the investment advisory service fee. These parties can charge accounts for various transaction costs, retirement plan and administration fees. Advisory clients should also note that fees from comparable services vary and lower fees for comparable services may be available from other sources.

VIII. Fees for Financial Planning/Consulting Services

In addition to advisory services, Legacy provides financial planning and consulting. F inancial planning fees are included in the client's investment management fees. An agreement will be signed by both Legacy and the client prior plan engagement.

Additional planning and consulting services are billed at the rate of $250.00 per hour, or a negotiated fee based upon the complexity and unique needs of the client. The hourly fee or negotiated fee is due and payable upon completion of services rendered. An agreement will be signed by both Legacy and the client prior to the consulting engagement.

Clients are free at all times to accept or reject any of Legacy's financial planning recommendations. If clients elect to implement recommendations made in a financial plan, their accounts will incur transaction costs, retirement plan administration fees, and other mutual fund expenses. These fees are in addition to and separate from planning and consulting fees.

Clients will have a period of five (5) business days from the date of signing a financial planning or consulting agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, clients have the authority to terminate an agreement by providing Legacy with written notice prior to delivery of the plan or completion of the service. Legacy has the authority to terminate an agreement by providing written notice to clients. Upon termination of the Firm's services, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client.

It should be noted that Legacy has clients who were engaged to receive advisory services prior to the incorporation of the fee schedule disclosed herein. These clients are considered "legacy" clients and can pay a fee that is higher or lower than the fees stated above.

For more information on other fees, transaction costs, or other charges, see Item 12, Brokerage Practices.

IX. Legacy Next Program

Legacy Next management fee is assessed quarterly, in advance, and is calculated using the average daily balance method. The average daily balance for each account is determined by calculating the total dollar value for every calendar day during the quarter. The account balance for every day in the quarter is added together, and then divided by the number of calendar days in the quarter. The fee is calculated by multiplying the average daily balance of the account by the fee percentage.

The annual investment management fee assessed is one percent (1%) of Client's assets under management.

Upon termination of the Firm's services, fees will be prorated to the date of termination and any unearned portion of the fee will be refunded to the client. There is no charge for financial forecasting, aggregation or client portal services. The fees for such services are incorporated into the wealth management fees described above.

X. Private Offerings, Limited Partnerships, and Alternative Investments

For limited partnerships and similar private offerings managed or supervised by Legacy, the manner of payment of the client's fee will depend upon the specific investment offering and will be in addition to other advisory or consulting fees. The client is invoiced directly. Such assets are not included in assets under management for the purposes of calculating fees and billing.

For more information on other fees, transaction costs, or other charges, see Item 12, Brokerage Practices.

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

Legacy does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 Types of Clients

General Clients: Description

Legacy generally provides investment advice and portfolio management services to individuals, high net worth individuals, trusts, estates or charitable institutions and corporations or business entities.

General Clients: Account Minimums

Legacy requires a minimum of $250,000 to establish a new advisory account. However, at the sole discretion of advisors Michael Lutz, Michael Wren, Chris Proctor, Jeffrey Hrabe, David Dwyer, Jacob Watts, Andrew Rogers or Joseph Nafziger, this minimum can be waived. In addition, Legacy can continue to service existing accounts that have values that are below the $250,000 minimum.

Legacy Next Program

The goal is to provide a more cost-effective platform for account management for individuals whose account balance is under $250,000. Model portfolios are selected and developed by Legacy's investment committee, and each advisor will select an established model based upon a variety of financial factors and client risk assessment. The types of clients that fit the profile for Legacy Next will be ones that are proficient in utilizing online tools and a primarily online communication method with the firm. Custodian transaction costs are very low or non-existent for this program. The financial forecasting portion of the program is included and not charged separately to the client as described in Item 5.

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

Methods of Analysis

Legacy uses the Fundamental Analysis method in evaluating investment opportunities, including the analysis of individual securities, mutual funds, ETFs and other investment types. When analyzing individual securities, analyses surrounding factors such as earnings, balance sheet variables, and management quality are considered. In trying to determine the true value of the security, in the majority of cases where we are using mutual funds or ETFs, this research is done through outside independent rating agencies, including, but not limited to, Morningstar, Standard and Poor's and Schwab.

Legacy has an investment committee which meets and discusses the investments our clients hold, and any changes to investment recommendations. The committee is made up of Michael Lutz, Michael Wren, Chris Proctor, Sam Murray, Jeffrey Hrabe, David Dwyer, Jacob Watts, Andrew Rogers and Joseph Nafziger. On a monthly basis, the committee will be responsible for conducting the meeting and documenting the results of the meeting.

Investment Strategies

As noted in Item 4 above, Legacy can recommend allocation of certain client assets to portfolio managers or a managed account platform for investing. When selecting a portfolio advisor for a client, Legacy reviews information about the portfolio advisor, such as its disclosure brochure and other materials supplied by the portfolio advisor or independent third parties for a description of the portfolio advisor's investment strategies, past performance, and risk results to the extent available.

Legacy uses the following investment strategies to implement any investment advice given to clients:

- Long term purchases (securities held at least a year), strategic allocation.
- Short term purchases (securities sold within a year) are used on a tactical basis for portfolios.

The investment strategies Legacy uses in managing clients' accounts incur market risk, in that a portfolio may rise and fall in value as the market rises and falls. Open end mutual funds and ETFs incur additional fees which are not present in the purchase and sale of individual equities and bonds. Leveraged and inverse ETFs may incur loss at an accelerated rate during quickly dropping markets. US companies may have global risk because they are often multi- national. Similarly, changes domestically can cause changes across the globe.

Legacy develops portfolios for clients based upon its understanding of the client's requirements, so the Advisor depends upon the accuracy of this information throughout the term of the relationship. If the client has not informed Legacy of changes in his/her situation, the portfolio could have the potential to not meet the client's changed needs.

Sources of Information

Legacy has access to various research reports and model portfolios to which Michael Lutz, Michael Wren, Chris Proctor, Jeffrey Hrabe, David Dwyer, Jacob Watts, Andrew Rogers or Joseph Nafziger can refer to in determining which securities to purchase or sell. Legacy also obtains its information for analysis of investments through financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases.

Legacy obtains detailed client information and other pertinent data from financial statements, tax forms, and other material provided by the client. This assists Legacy in selecting appropriate investments for the client based on the client's investment objective and goals.

Types of Investments

Legacy offers advice to clients on the following types of investments:

- Equity Securities (exchange-listed securities, securities traded over the counter, and foreign issues)
- Mutual Funds
- Exchange Traded Funds (ETFs)
- Warrants
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Investment company securities (life insurance, annuities, and mutual fund shares)
- United States government securities
- Interests in partnerships or private offerings investing in real estate and oil and gas interests
- Publicly traded and non-publicly traded REITs (real estate investment trusts)
- Publicly traded and non-publicly traded BDCs (business development companies)

Risk of Loss

Investing in securities involves a risk of loss that clients should be prepared to bear. Diversification and asset allocation may not protect against market risk. You should not assume that an investment in any of the securities was or will be profitable. Legacy does not guarantee the future performance of any client's account or any specific level of performance, the success of any investment decision or strategy that Legacy uses, or the success of the Advisor's overall management of the account. Investment decisions made for a client's account by Legacy are subject to various market, currency, economic, political and business risks, and those investment decisions will not always be profitable. Investing in any security entails risk of loss. Alternative investments, private offerings, limited partnerships, and third-party managers carry potential risk factors that include lack of liquidity, lack of transparency, and other risks identified by such managers in their disclosure documents.

Types of financial risk and a definition of each:

- **Market Risk –** Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities to rise or fall. This volatility is also referred to as systematic or undiversifiable risk. Because the value of your investment in the portfolio will fluctuate, there is the risk that you will lose money.
- **Asset Class Risk –** An asset class is a subset of the overall market. Daily fluctuations in specific asset classes may be more extreme than fluctuations in the overall market. Returns from any given asset class may trail returns from the overall stock market.
- **Liquidity Risk:** the risk on the easiness to buy or resell an asset. If a market is not fluid, you might not find a buyer when you want to or not to find a seller when you truly need one. It is a risk related to the nature of the underlying (of the merchandise) but also to the credibility of the buyer-seller. It is easy to buy or to sell a common product to a trustworthy counterpart, but it is more difficult with a much-specialized product. It is the liquidity of this product. Moreover, if the buyer/seller is not credible, the compensation risk for the potential suppliers/prospects dissuades them from dealing. The buyer/seller is in supply risk, in "liquidity" risk. For a bank, it is the risk to be in the inability to face a massive withdrawal of deposits by the customers.
- **Rate risk:** the risk of loans-borrowings. It is the risk that credit rates evolve in an unfavorably way. Thus, a borrower with a variable rate undergoes a rate risk when rates increase because he has to pay more. Conversely, a lender undergoes a risk when rates decrease because he loses incomes. For a bank, it is the risk that the market rates evolution leads to remuneration costs of deposits superior to the earnings generated by the interests of granted loans.
- **Exchange risk:** it is the risk on the variations of legal tenders between them. A risk noticeably related to time factor.
- **Counterparty risk:** the risk that the party with which a contract has been closed does not keep its commitments (delivery, payment, refund…). For a bank, it is the risk that its customers are unable to pay back their loans, or that another bank, with which it has operations in progress (banking correspondent), is defaulting.

- **Country risk: i**f a country is in a serious crisis (war, revolution, and stream of bankruptcy…) then even "trustworthy" firms, despite their credibility are going to be in difficulty. It is a counterparty risk related to the environment of the counterparty. The country risk, strictly speaking, is the probability that a country will provide the service of its outside debt. Some countries can involve vulnerabilities toward international investments. The analysis of vulnerability toward this kind of risk becomes a necessity in the management of financial risks. The International Monetary Fund dedicates work to the prevention of crises in that field. The purpose is to improve the aptitude to determine the vulnerability degree of the member countries toward financial crises. Vulnerability indicators form an essential part to these works. They bring a decisive contribution to the supervision exercise and loans operations of the IMF. Those indicators are used for analysis and resistance tests in the evaluation program frame of the financial sector, and also for early warning systems models (EWS).
- **Investing in partnerships, alternative, or non-traditional investments:** investments such as private placements or real estate, involve specific risks that may be greater than those associated with traditional investments, including:
    i. Alternatives may have limited liquidity due to lock-up periods and lack of markets;
    ii. Many alternatives have high cost of entry, requiring hefty minimum purchases;
    iii. Such products employ potentially speculative investment strategies;
    iv. Changes in tax laws may impact the performance;
    v. Many alternatives have different regulatory and reporting requirement; or
    vi. Client reports may be inaccurate because the values of the positions are generally not priced on a regular basis.
- **Margin Risk:** when you purchase securities, you may pay for the securities in full or borrow part of the purchase price from your account custodian. If you intended to borrow funds in connection with your Account, you will be required to open a margin account, which will be carried by the custodian. The securities purchased in such an account are the custodian's collateral for its loan to you. If those securities in a margin account decline in value, the value of the collateral supporting this loan also declines, and as a result, the Firm and/or custodian is required to act in order to maintain the necessary level of equity in your account. The custodian may issue a margin call and/or sell other assets in your account. It is important that the Client fully understand the risks involved in trading securities on margin, which are applicable to any margin account that maintained, including any margin account that may be established as part of the Investment Advisory Agreement established between you and Legacy and held by the account custodian. Risks of margin investing include:
    i. The Client may lose more than the principal invested, as the risk includes the amount invested plus the amount that has been loaned;
    ii. The custodian may force the sale of securities or other assets in the account if the equity in the margin account falls below the margin requirements or to meet the margin call;
    iii. The Client may not be entitled to select which securities will be sold to meet margin requirements;
    iv. The account custodian may sell securities or other assets in the margin account without contacting the Client;
    v. The account custodian may move securities held in the cash account to the margin account and pledge the transferred securities;
    vi. The Client may not be entitled to an extension of time on a margin call; or
    vii. Margin requirements may be changed by the custodian without notice.
- **Fixed Income Risk –** When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **ETF and Mutual Fund Risk –** When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- **Opportunity Cost Risk –** By investing in a particular investment mix an investor may forego returns available from other investments over the given time period.

- **Company Specific Risk –** The stock price of any particular company may go down due to factors specific to that company or industry, such as an employee strike, poor management decisions, unfavorable media attention, many other possibilities. This is also referred to as Unsystematic risk as it is unrelated to movements in overall market prices. TCM portfolios are designed to minimize exposure to this risk.
- **Credit Risk –** When investing in bonds or other fixed income securities, there is the risk that the issuer will default on the bond and be unable to make payments. There may also be a change in a security's price based on changes in the issuer's default risk.

Item 9 Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Legacy or the integrity of Legacy's management.

Legacy has not been involved in any disciplinary action, nor found liable in any arbitration claims or civil proceedings. Legacy has not been the subject of a bankruptcy petition.

Item 10 Other Financial Industry Activities and Affiliations

Business Activities & Affiliations

Michael Lutz, Heather Hardman, Michael Wren, Chris Proctor, Sam Murray, Jeffrey Hrabe, David Dwyer, Jacob Watts, Andrew Rogers and Joseph Nafziger are registered investment adviser representatives. In addition to investment advisory services, Michael Lutz, Michael Wren, David Dwyer, Jacob Watts, Jeffrey Hrabe, Sam Murray, Chris Proctor, Andrew Rogers and Joseph Nafziger also provide financial planning services and investment research for the firm.

Michael Lutz holds an active insurance license (NPN #4906965) but does not provide insurance services for compensation on either an individual basis or as a Legacy advisor as Legacy is no longer registered as an insurance agency. Michael Lutz does not solicit for insurance business nor does he receive commission trails on historical sales.

Selection of Other Investment Advisors & Managers

Legacy can utilize third-party managers and/or unaffiliated alternative investment vehicles for the purpose of providing clients with alternative investment options to help achieve the client's investment objectives. Legacy does not receive compensation from these managers or alternative investment vehicles.

Legal Services

Legacy does not provide legal services but does have an arrangement with a Swanson Bernard LLC, a law firm located in Kansas City, MO, to provide estate planning and other legal services to Legacy clients at a reduced rate. Although Legacy receives no compensation for referring clients to Swanson Bernard, the firm has been identified as an approved legal provider by Legacy and has agreed to provide Legacy clients legal services at reduced billing rates. Legacy client are not obligated to use this or any other law firm and are free to contract with any legal or accounting professionals they so choose at any time. Legacy may at its discretion elect to cover some client legal and or accounting costs for some of its larger clients.

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

Code of Ethics

Legacy has adopted a Code of Ethics (the "Code") in compliance with Rule 204A-1 under the Investment Advisers Act of 1940. The Code establishes standards of conduct for Legacy supervised persons for all supervised persons of the firm and it describes its high standard of business conduct, and fiduciary duty to

its clients. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. It also requires that access persons of Legacy report their personal securities and holdings and obtain pre-approval of certain investments.

All supervised persons at Legacy must acknowledge the terms of the Code annually, or as amended. Legacy will provide a copy of its Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions and Personal Trading

Legacy anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Legacy has management authority to effect and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Legacy, its affiliates and/or clients directly or indirectly have a position of interest. Legacy's employees and persons associated with Legacy are required to follow Legacy's Code. Subject to satisfying this policy and applicable laws, officers, directors, and employees of Legacy and its affiliates can trade for their own accounts in securities which are recommended to and/or purchased for Legacy's clients. The Code is designed to assure that the personal securities transactions, activities and interests of the employees of Legacy 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 have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Legacy's clients. In addition, the Code requires pre-clearance of many transactions and restricts trading in close proximity to client trading activity. Nonetheless, because the Code 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, and to reasonably prevent conflicts of interest between Legacy and its clients.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons are also permitted to buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

Legacy's clients or prospective clients can request a copy of the firm's Code of Ethics by contacting Heather Hardman.

Principal or Agency Cross Securities Transactions

Per SEC Section 206(3) of the Investment Advisers Act of 1940, principal transactions or agency cross transactions are prohibited by investment advisors unless they are also registered as a broker-dealer. Legacy is not a registered broker-dealer and does not participate in agency cross transactions.

Item 12 Brokerage Practices

The Custodians Legacy Uses

Legacy Financial Strategies, LLC does not maintain custody of client assets on which we advise, although pursuant to Rule 206(4)-2 of the Advisers Act, Legacy is deemed to have "constructive custody" of client funds because the Firm has the authority and ability to debit its fees directly from the accounts of those clients receiving Legacy's Investment Advisory Services. Additionally, certain clients have, and can in the future, sign a Standing Letter of Authorization (SLOA) that gives Legacy the authority to transfer funds to a third-party as directed by the client in the SLOA. This is also deemed to give the Firm custody. Custody is defined as any legal or actual ability by the Firm to withdraw client funds or securities. (see Item 15 – Custody, below).

Legacy client assets must be maintained in an account at a "qualified custodian". The custodians Legacy recommends to clients to use include Charles Schwab & Co., Inc. ("Schwab") and Fidelity Investments ("Fidelity") both of which are FINRA registered broker-dealers and members of SIPC. SEI Investment Company/SEI Private Trust Corporation/SEI Investments Management Corporation ("SEI") is a limited

purpose federal savings association. We are independently owned and operated and are not affiliated with Schwab, SEI, Fidelity, or American Funds.

Legacy will place transactions for client accounts through the client's appointed custodian (Schwab, Fidelity, SEI, American Funds). While we can recommend these custodians, the client will decide whether to do so and will open and account directly with the custodian by entering into an account agreement directly with them. Legacy does not open accounts for our clients, although we can assist in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though some Legacy client accounts are maintained at the above custodians, we can still use other brokers to execute trades for your account as described below (for example, see "Schwab Client Custody Costs").

How Legacy Selects Custodians

Legacy seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. Legacy considers a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buys and sells securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see example for Schwab in "Products and Services Available to Us from Schwab")

I. Charles Schwab As Custodian

Schwab Client Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge clients separately for custody services but is compensated by charging clients commissions or other fees on trades that it executes or that settle into the Schwab account. Legacy has determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodians").

Products and Services Available to Legacy From Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help Legacy manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available to us on an unsolicited basis (we don't have to request them) and at no charge to us.

Following is a more detailed description of Schwab's support services:

A. Services That Benefit Legacy Clients: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of

client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and the client account.

B. Services That May Not Directly Benefit Legacy Clients: Schwab also makes available to us other products and services that benefit us but not directly benefit a client or client account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. Legacy can use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
    - Provide access to client account data (such as duplicate trade confirmations and account statements)
    - Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
    - Provide pricing and other market data
    - Facilitate payment of our fees from our clients' accounts
    - Assist with back-office functions, recordkeeping, and client reporting

C. Services That Generally Benefits Only Legacy: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
    - Educational conferences and events
    - Consulting on technology, compliance, legal, and business needs
    - Publications and conferences on practice management and business succession
    - Access to employee benefits providers, human capital consultants, and insurance providers

Schwab can provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to Legacy. Schwab can also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab can also provide Legacy with other benefits, such as occasional business entertainment of our personnel.

Legacy's Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. We have an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as a custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

Best Execution

Legacy is aware of its duty to obtain best execution for all securities transactions executed on a client's behalf. Securities transactions for accounts are affected through Schwab without commissions being paid to Legacy. While Schwab make every attempt to obtain the best execution possible, there is no assurance that it will be obtained. Clients should consider whether or not the appointment of Schwab as the sole broker/dealer could result in certain costs or disadvantages to the client as a result of possibly less favorable executions. In considering whether or not to restrict the execution of transactions through Schwab, Legacy considered its capabilities to execute, clear and settle transactions.

Order Aggregation

Schwab can aggregate transactions for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. For partially filled orders, Schwab will generally allocate trades pro-rata or on some other basis consistent with the goal of treating all clients equitably over time.

Soft Dollars

Legacy receives no soft dollar an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above. The availability to us of Schwab's products and services is not based on us giving investment advice, such as buying particular securities for our clients.

Directing Brokerage

Not all advisors require their clients to direct brokerage; by directing brokerage, Legacy could be unable to achieve the most favorable execution of its client transactions, and this could cost Legacy clients more money.

II. SEI As Custodian

Legacy participates in SEI's Advisor Network program, where they provide a trading platform for our advisors to execute trades and monitor client accounts. SEI offers a wide variety of securities and ETFs in addition to proprietary mutual funds as part of their securities offering. SEI offers general advisor-managed discretionary investment accounts as well as a managed account program. SEI's Managed Account program is a wrap fee program and is managed by a selected account manager. The account manager is responsible for managing the allocated assets according to a specific investment strategy that meet the client's goals and objectives. A Legacy advisor is responsible for working with the client to determine the appropriate account manager and investment strategy. If the client elects to utilize this service from SEI, the client will sign a separate agreement and pay fees associated for the managed account directly to the account manager and SEI.

Best Execution

SEI has a duty to seek best execution of the transactions executed by SEI for its client accounts. Although commission rates are an important consideration in determining whether "best execution" is being obtained, they are not determinative, as many other factors also are relevant in determining whether SEI has achieved the best result for Clients under the circumstances. SEI considers numerous factors in arranging for the purchase and sale of Clients' portfolio securities. These include any legal restrictions, such as those imposed under the securities laws and ERISA, and any Client-imposed restrictions. Within these constraints, SEI shall employ or deal with members of securities exchanges and other brokers and dealers or banks as SEI approves and that will, in the portfolio manager's judgment, provide "best execution" (i.e., prompt and reliable execution at the most favorable price obtainable under the prevailing market conditions) for a particular transaction for the Client's account. SEI periodically evaluates the quality of these brokerage services as provided by various firms. In determining the abilities of a broker-dealer or bank to obtain best execution of portfolio transactions, SEI will consider all relevant factors, including:

The execution capabilities the transactions require;

- The ability and willingness of the broker-dealer or bank to facilitate the accounts' portfolio transactions by participating for its own account;
- The importance to the account of speed, efficiency, and confidentiality;
- The apparent familiarity of the broker-dealer or bank with sources from or to whom particular securities might be purchased or sold;

- The reputation and perceived soundness of the broker-dealer or bank; and
- Other matters relevant to the selection of a broker-dealer or bank for portfolio transactions for any account.

SEI will not seek in advance competitive bidding for the most favorable commission rate applicable to any particular portfolio transaction or select any broker-dealer or bank on the basis of its purported or "posted" commission rate structure. Certain types of trades, such as most fixed income securities transactions, do not involve the payment of a commission.

Order Aggregation

SEI is permitted to aggregate or "batch" orders placed at the same time for the accounts of two or more Clients if it is in the best interests of its Clients. By batching trade orders, SEI can obtain more favorable executions and net prices for the combined order and ensure that no participating Client is favored over any other Client. Typically, SEI will affect block orders for the purchase and sale for the same security for Client accounts to facilitate best execution and to reduce transaction costs. When an aggregated order is filled in its entirety, each participating Client account generally will receive the block price obtained on all such purchases or sales with respect to such order. The portfolio manager for each account must determine that the purchase or sale of the particular security involved is appropriate for the Client and consistent with the Client's investment objectives and with any investment guidelines or restrictions applicable to the Client's account. The portfolio manager for each account must reasonably believe that the block trading will benefit and will enable SEI to seek best execution for each Client participating in the block order. This requires a reasonable good faith judgment at the time the order is placed for execution.

Soft Dollars

Legacy receives no soft dollar or other benefits from SEI.

Directed Brokerage

SEI uses its affiliated broker-dealer, SEI Investments Distribution Co. ("SIDCO"), for various services for its Clients. Other than trading in the SEI Funds, the Managed Account Program or other accounts where SEI has investment discretion, it is the Client's decision whether to execute a particular securities transaction using SIDCO. SEI discloses the use of its affiliated broker-dealer in the investment management agreement that the Client signs with SEI for services. By directing brokerage to SIDCO, SEI has the potential to be unable to achieve the most favorable execution for Client transactions and this practice could cost Clients more money.

In limited circumstances, a Client can direct SEI to use a particular broker-dealer (subject to the SEI's right to decline and/or terminate the engagement) to execute some or all transactions for the Client's account. In such event, the Client will negotiate terms and arrangements for the account with that broker dealer, and SIMC will not seek better execution services or prices from other broker-dealers or be able to "batch" the Client's transactions for execution through other broker-dealers with orders for other accounts managed by SEI. As a result, Client could pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

SEI could use SIDCO during transitions to liquidate the Client's securities portfolio. SEI can undertake such liquidations to make cash and/or in-kind securities investments in one or more of the SEI Funds. SIDCO serves as an introducing broker-dealer for these transactions, which means that SIDCO will introduce the transaction to one or more clearing brokers. SIDCO and the applicable clearing brokers will receive and retain compensation (i.e., commissions) for executing such transactions. Information regarding the relationship between SIMC and SIDCO are disclosed to the Client in the investment management agreement. In the case of Clients subject to ERISA, SEI's use of SIDCO for transition services will be in accordance with applicable guidance from the U.S. Department of Labor. In order to comply with applicable law, the Client is permitted to withdraw its consent to the use of SIDCO for Client transactions by sending a written notice to SEI.

III. Fidelity As Custodian

Legacy's advisors that work with Fidelity are utilizing Fidelity's institutional Investment offering where Fidelity provides a trading platform in which to execute trades and monitor portfolios for participant accounts in ERISA or other qualified plans. Legacy is provided with a trading platform that enables the advisor to place trades and perform allocations on behalf of their clients.

Best Execution

While Legacy does not aggregate client orders, Fidelity can aggregate orders on their system. It has the potential to not provide an economic benefit to the client, especially in the case of mutual fund orders.

Soft Dollars

Legacy does not have a soft dollar relationship with Fidelity. However, Fidelity offers other services to the firm intended to help us manage our business enterprise. These services include:

- Educational articles and online content
- Market data and research tools
- Publications on practice management

Order Aggregation

Fidelity can aggregate orders for the purchase and sale for the same security for Client accounts to facilitate the quality of execution and to reduce transaction costs.

Directed Brokerage

By directing brokerage, Legacy could be unable to achieve the most favorable execution for its client transactions, which could cost Legacy clients more money.

Item 13 Review of Accounts

Michael Lutz, Michael Wren, Chris Proctor, Jeffrey Hrabe, David Dwyer, Jacob Watts, Andrew Rogers and Joseph Nafziger perform reviews of all investment advisory accounts no less than annually. Accounts are reviewed for consistency with the investment strategy, investment allocation, performance, and asset quality, among other things. Reviews can be triggered by changes in an account holder's personal, tax, or financial status. Macroeconomic and company specific events can also trigger reviews. There is currently no limit on the number of accounts that can be reviewed by Michael Lutz, Michael Wren, Chris Proctor, Jeffrey Hrabe, David Dwyer, Jacob Watts, Andrew Rogers or Joseph Nafziger. Reviews are done in person or over the phone.

Advisory account statements are generated by our custodians no less than quarterly. These statements are sent directly to the account owner. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each account transaction.

In addition to quarterly account reviews, Michael Lutz, Michael Wren, Chris Proctor, Jeffrey Hrabe, David Dwyer, Jacob Watts, Andrew Rogers and Joseph Nafziger can utilize support material to review client accounts, including Weekly Email Market Commentary, Monthly Trade Logs, and Monthly Performance Updates.

Item 14 Client Referrals and Other Compensation

Incoming Referrals

Legacy has arrangements with outside individuals and other professional entities to refer clients to us from time to time. Such arrangements are structured to be in compliance with applicable securities laws. For

example, where applicable a client is provided a disclosure statement prior to or at the time of entering into any advisory contract which describe the specific compensation arrangement. The advisory fee charged to clients does not increase as a result of such referral arrangements.

Legacy also accepts client and professional referrals on a non-compensatory basis.

Referrals Out

Legacy does not receive any compensation for any outside client referrals, including referrals made to estate planners, attorneys and/or tax preparation places.

Other Compensation

Legacy and its employees can receive additional non-cash compensation from advisory product sponsors. Such compensation will not be tied to the sales of any products. Compensation includes such items as gifts valued at less than $300 annually, an occasional lunch, dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. Advisory product sponsors can also pay for education or training events attended by Legacy's employees.

Legacy receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Legacy receives no additional compensation or economic benefits from the custodians we utilize.

Item 15 Custody

Pursuant to Rule 206(4)-2 of the Advisers Act, Legacy is deemed to have "constructive custody" of client funds because the Firm has the authority and ability to debit its fees directly from the accounts of those clients receiving Legacy's Investment Advisory Services.

Additionally, certain clients have, and can in the future, sign a Standing Letter of Authorization (SLOA) that gives Legacy the authority to transfer funds to a third-party as directed by the client in the SLOA. This is also deemed to give the Firm custody. Custody is defined as any legal or actual ability by the Firm to withdraw client funds or securities. Firms with deemed custody must take the following steps:

1. Ensure clients' managed assets are maintained by a qualified custodian;
2. Have a reasonable belief, after due inquiry, that the qualified custodian will deliver an account statement directly to the client at least quarterly;
3. Confirm that account statements from the custodian contain all transactions that took place in the client's account during the period covered and reflect the deduction of advisory fees; and
4. Obtain a surprise audit by an independent accountant on the clients' accounts for which the advisory firm is deemed to have custody.

However, the rules governing the direct debit of client fees and SLOAs exempts Legacy from the surprise audit rules if certain conditions (in addition to steps 1 through 3 above) are met. Those conditions are as follows:

1. When debiting fees from client accounts, Legacy must receive written authorization from clients permitting advisory fees to be deducted from the client's account.
2. In the case of SLOAs, Legacy must: (i) confirm that the name and address of the third party is included in the SLOA, (ii) document that the third-party receiving the transfer is not related to the Firm, and (ii) ensure that certain requirements are being performed by the qualified custodian.

If client funds or securities are inadvertently received by our firm, they will be returned to the sender immediately, or as soon as practical

Notably, in most cases a Client's broker-dealer also acts as the custodian of the Client's assets for little or no extra cost. Clients should be aware, however, of the differences between having their assets custodied at a broker-dealer versus at a bank or trust company. Some of these differences include, but are not limited to, custodian costs, trading issues, security of assets, Client reporting and technology.

Clients will receive statements on at least a quarterly basis directly from the qualified custodian showing all disbursements, including Legacy's advisory fees, deducted from the account. Clients are urged to carefully review all custodial statements for accuracy. It is the Client's responsibility (and not the custodian's) to ensure the Fee and its calculation in relation to the Client's account is correct. In the event that Clients also receive account statements from Legacy, it is strongly encouraged that Clients compare these account statements to any account reports provided by the qualified custodian. Legacy reports can vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Please refer to Item 12 for additional important disclosure information relating to Legacy's practices and relationships with custodians.

Item 16 Investment Discretion

Legacy requests discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. Legacy will also exercise discretion to determine the broker/dealer or custodian to be used in the purchase or sale of securities for a client's account. In all such cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives and client's risk profile for the particular client account.

When selecting securities and determining amounts, Legacy observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Legacy in writing.

The client grants the Advisor limited power of attorney with discretionary trading authority to effect transactions in a client account by designating a discretionary relationship on the Investment Advisory Agreement.

Clients that have selected to invest assets using a portfolio manager grant the manager of those portfolios discretion to buy, sell, and trade in securities that meet the client's objectives.

Item 17 Voting Client Securities

As a matter of firm policy and practice, Legacy does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients can receive proxies or solicitations from a transfer agent, fund company, or Schwab in relationship to their investments with Legacy. Legacy and associated persons will not be required to take any action or render advice with respect to the voting of proxies.

Legacy clients can contact us by phone or email with questions regarding any solicitation or proxy they may have received from a transfer agent, fund company, custodian.

Item 18 Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Legacy's financial condition. Legacy 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.

Legacy does not require nor solicit prepayment of more than $500 in fees per client, six months or more in advance and therefore is not required to provide, and has not provided, a balance sheet.