Part 2A of Form ADV: Firm Brochure

Legacy Financial Strategies, LLC ("Legacy")

5400 College Blvd., Ste. A
Overland Park, KS 66211

Phone: (913) 403-0600
Fax: (913) 403-0700

Website: http://www.legacykc.com

Email Addresses:
Michael Wren: mike.wren@legacykc.com
Bethany Boschert: Bethany.Boschert@legacykc.com

Date: February 11, 2025

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 Bethany Boschert 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 February 11, 2025, 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 January 25, 2023, subsequently amended March 19, 2024 and June 01, 2024, we have changed our primary address and updated descriptions of services, fees, brokerage practices, and custody. We have also made numerous other minor updates but no other 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.

Item 3 Table of Contents

Section Name	Page
Item 4 Advisory Business	4 – 5
Item 5 Fees and Compensation	5 – 7
Item 6 Performance-Based Fees	7
Item 7 Types of Clients	7
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	7 – 10
Item 9 Disciplinary Information	10
Item 10 Other Financial Industry Activities and Affiliations	10
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	10 -11
Item 12 Brokerage Practices	11 – 12
Item 13 Review of Accounts	12
Item 14 Client Referrals and Other Compensation	12 - 13
Item 15 Custody	13
Item 16 Investment Discretion	13
Item 17 Voting Client Securities	13
Item 18 Financial Information	14

Item 4 Advisory Business

Firm Description and Ownership

Legacy was established in May of 2000 and is registered as an advisory firm with the Securities and Exchange Commission ("SEC"). Legacy's controlling owner is Michael Wren. Minority owners include Christopher Proctor, David Dwyer, Jacob Watts, Andrew Rogers, Jeffrey Hrabe, and Joseph Nafziger. Bethany Boschert serves as the firm's Chief Compliance Officer.

Types of Services Offered by Legacy

A. Investment Management Services

Legacy provides ongoing discretionary and non-discretionary investment management services to individuals, families and businesses. When providing portfolio management services, the firm not only makes recommendations related to investments, but also implements these recommendations and provides ongoing monitoring and reporting. In some cases, the firm may delegate certain investment management responsibilities to outside managers or platform providers. Clients may elect to give the firm discretion to make all decisions (discretionary management), or may prefer to approve all decisions before implementation (non discretionary management).

Legacy also provides more streamlined, lower cost investment management services using simple ETF model portfolios which are tailored for smaller accounts (generally less than $250,000) under its Legacy Next program.

Regardless of the level of discretion provided, each engagement is tailored to the individual needs of the particular client (whether an individual, a family, or a business) through an assessment conducted prior to an engagement. Clients may impose restrictions related to the level of discretion granted, the types of investments used, etc. Terms of an actual engagement, including description of service, limitations and restrictions, fees, etc., are all detailed before any engagement begins in a written client agreement.

As of December 31, 2024, Legacy's assets under management totaled $806,094,432. Of this total, $800,558,779 was managed on a discretionary basis and $5,535,653 was managed on a non-discretionary basis.

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. Retirement Plan Services

Legacy provides plan level retirement plan services to retirement plans and retirement plan sponsors. These services can be structured as non-discretionary management engagements where clients make all decisions (with Legacy assisting with implementation), or as non-management advisory engagements where the client makes all decision and is responsible for implementation (with Legacy providing consulting advice and other assistance). Services provided depend on the specific needs of the client and may include assistance with plan setup, investment selection, and ongoing support services, among other things.

C. Financial Planning/Consulting Services

Legacy provides project oriented and ongoing financial planning services and consulting services to individuals and families where the firm offers advice or other strategic assistance in areas such as education funding, retirement planning, estate planning, risk management, employee benefits planning, tax planning, etc. When engaged to provide financial planning assistance, clients are responsible for determining whether or not to implement a recommendation, and if they decide to do so, are responsible for implementation. The details of an engagement vary on a case by case basis depending on the complexity of the client's financial situation. Generally, however, an engagement involves identification of goals and objectives, collection and analysis of data, and formulation of a strategy, and may also include the preparation of a written plan.

D. Non-Management Investment Advisory Services

Legacy also provides non-management investment advisory and consulting services related to publicly traded investments, limited partnerships or private offerings in the real estate sector, alternative investments, and other types of investments.

Item 5 Fees and Compensation

A. Fees for Investment Management Services

Legacy charges fees based on a percentage of assets under management or as a fixed fee. Actual fees charged by Legacy are detailed in each client's investment management agreement with Legacy. Legacy reserves the option to negotiate fees based upon the complexity and unique needs of each client. Legacy does not aggregate account values within a household for purposes of determining applicable fee levels in a tiered structure, unless the Firm has agreed to do so. Either party has the authority to terminate the agreement with 30 days' written notice.

Advisory fees are billed quarterly in advance (i.e. at the beginning of the service quarter). 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 preceding the service quarter. All account balances for that quarter are then added together and divided by the number of days in that 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%

Fees are generally deducted directly from the client's applicable account(s) unless other arrangements are made and agreed to by Legacy Should the client open an account during a quarter, the partial period fee will be billed in arrears and prorated based on the beginning balance and the number of days that the Account was open during the quarter. Should the client add to an account during a quarter, the partial period fee will be billed in arrears and prorated based on the contribution amount and the number of days that the additional funds were in the account during the quarter.

Accounts under the Legacy Next program are billed at an annual rate of up to 1.50% Legacy may have previously negotiated fee arrangements with current clients that are no longer offered to new clients which differ from the fee terms and schedule above. Additionally, Legacy may charge accounts held outside of our regular custodians (e.g. directly held mutual funds, 529 accounts, annuities, etc.) based on ending balance rather than average daily balance.

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 fees, and other administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12b-1 fees which are retained by the custodian and not rebated to Legacy. Mutual funds have expenses as described in each fund's prospectus. Outside manager fees may also apply, but such fees shall be disclosed to the client in advance.

B. <u>Fees for Retirement Plan Services</u>

The fee associated with retirement plan services is determined on a negotiated basis between Legacy, the client, and associated third parties. Fees are due either monthly or quarterly in advance. Fees are due on the first day of the service period 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 service period and are prorated for accounts opened during a service period.

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.

C. <u>Fees for Financial Planning/Consulting Services</u>

In addition to advisory services, Legacy provides ongoing and project based financial planning and consulting services. An agreement will be signed by both Legacy and the client prior to 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.

D. Fees for Non-Management Investment Advisor Services

For non-management investment advisory services (e.g. limited partnerships, private offerings, etc.), 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 $500,000 to establish a new advisory account, but the firm reserves the right to accept or decline any account.

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.

Investment Strategies

Legacy's general investment strategy, consistent with the tenets of modern portfolio theory, is to attempt to reduce risk and volatility by building globally diversified portfolios. As noted in Item 4 above, Legacy can recommend allocation of certain client assets to outside portfolio managers or platform providers.

While mutual funds and exchange traded funds are the primary investment vehicles used in or recommended for client accounts, we may also use or recommend various other investment vehicles in the implementation of our strategies. Implementation can include long-term purchases (securities held at least a year), short-term purchases (securities sold within a year), trading (securities sold within 30 days), margin and options.

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.

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 the evaluation of Legacy or the integrity of Legacy's management.

Legacy in not currently subject to, nor have ever been subject to, any legal or disciplinary events of this nature.

Item 10 Other Financial Industry Activities and Affiliations

Business Activities & Affiliations

Legacy has no other financial industry activities or affiliation.

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 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 clients 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") which establishes standards of conduct for Legacy supervised persons for all supervised persons of the firm and describes its standard of business conduct and fiduciary duty. 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

Individuals associated with Legacy are permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. However, no person employed by Legacy is allowed to favor his or her own interest over that of a client or make personal investment decisions based on the investment decisions of advisory clients.

In order to address potential conflicts of interest, Legacy requires that associated persons with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer. Legacy also requires prior approval from the Chief Compliance Officer for investing in any IPOs or private placements (limited offerings).

Item 12 Brokerage Practices

The Custodian and Brokers We Use

We do not maintain custody of client assets. Instead, we require all client assets be maintained in an account at a non affiliated "qualified custodian," generally a broker-dealer or bank. We are not affiliated with any particular custodian but instead all custodians are independently owned and operated. The custodian will hold your assets in a brokerage account and will be able to buy and sell securities on your behalf.

While we may recommend that you use a particular custodian/broker, you will ultimately decide whether to do so and will open your account with the custodian/broker by entering into an account agreement directly with one of them. We cannot actually open accounts for you, but we can assist you in opening an account at whatever custodian/broker you decide to use.

How We Select Custodians and Brokers

When recommending a custodian or broker for our clients, we consider many different factors including quality of service, types of services offered, overall capability, execution quality, competitiveness of transaction costs, availability of investment research, reputation of the firm, and financial resources, among other things. In determining the reasonableness of a broker's compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

Your Brokerage and Custody Costs

Our clients receive various services directly from our custodians. For our clients' accounts that they maintain, the custodian generally does not charge separately for custody services but instead is compensated by charging commissions or other fees on trades that it executes or trades that are executed by other brokers to and from the custodial accounts. Fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a certain level of assets at the custodian. We feel this commitment benefits you because we expect the overall rates you pay will be lower than they might be otherwise.

Since custodians often charge clients a fee for each trade that we have executed by a different broker-dealer, we have the custodians execute most trades for your account in order to minimize your trading costs. We have determined that having the custodians execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means seeking the most favorable terms for a transaction based on all relevant factors, including those listed above.

Products and Services Available to Us from Brokers/Custodians

The custodians provide us and our clients with access to its institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to retail customers. The custodians also make available various support services, some of which may help us manage or administer our clients' accounts, while others may help us manage and grow our business.

Other institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset custody. The investment products available through the custodians include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

The custodians may also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both the custodians' own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the custodians. In addition to investment research, the custodians may also make available software and other technology that provide access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

The custodians may also offer other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from the custodians benefit us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with a particular custodian based on our interests rather than yours, which is a potential conflict of interest. We believe, however, that our recommendation of a custodian is in the best interests of our clients, and is primarily supported by the scope, quality, and price of the custodian's services and not the custodian's services that benefit only us.

Aggregation of Transactions

Legacy may, from time to time, aggregate client orders into blocks in order to facilitate more efficient account management and execution. When aggregating orders, an average price is given to all participants in the block, or other measures are taken, in order to treat all accounts fairly.

Item 13 Review of Accounts

Reviews of all investment advisory accounts are conducted by the firm's investment adviser representatives 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.

Advisory account statements are generated by our custodians. 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.

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 disclosure information prior to or at the time of entering into any advisory contract which describe the 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 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 firm may also receive travel expense reimbursements for industry meetings related to market analysis, investment strategies, and practice management, and other benefits from product sponsors or platform providers. The availability to us of these products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Furthermore, our representatives are required to make all investment decisions and recommendations based solely on the interests of the applicable client.

Item 15 Custody

As noted in Item 12, Legacy recommends that clients' assets be held by a qualified custodian. Although we do not hold assets, we may have limited control in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements to you or other outside parties (although various types of written authorizations are required depending on the type of disbursements).

You will receive account statements directly from your custodian at least quarterly, which will be sent to the email or postal mailing address you provide. Legacy urges clients to carefully review custodial statements and compare them to any account reports that we might provide.

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. 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.

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

Legacy does not have any authority to and does not vote proxies on behalf of advisory clients. Clients may receive proxies or solicitations from a transfer agent, fund company, or Schwab in relationship to their investments with Legacy.

Legacy clients can contact us by phone or email with questions regarding any solicitation or proxy they may have received.

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, such as if the firm has a financial condition that impairs its ability to meet contractual and fiduciary commitments to clients, has been the subject of a bankruptcy proceeding, or requires t prepayment of more than $1,200 in fees per client, six months or more in advance.

Legacy has no financial or operating conditions which trigger such additional reporting requirements.