Legacy Wealth Management, LLC

13965 W. Chinden Blvd.
Boise, ID 83713

Telephone: 208-955-0500
Facsimile: 208-955-4305

http://www.legacywealthmg.com
https://www.facebook.com/LegacyWealthManagementLLC/
https://www.instagram.com/legacywealthmanagement/
https://www.linkedin.com/company/legacy-wealth-management-group/about/
https://thelwg.com/

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AMENDED FORM ADV PART 2A
BROCHURE

This brochure provides information about the qualifications and business practices of Legacy Wealth Management, LLC. If you have any questions about the contents of this brochure, contact us at 208-955-0500. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Legacy Wealth Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Legacy Wealth Management, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

Since the last annual update to our ADV, we have made the following material changes:

1) Paul Hickey has been named Chief Executive Officer (CEO) of Legacy Wealth Management, LLC.

2) Legacy Wealth Management experienced a material increase in assets under management from approximately $476 million to approximately $629 million during the reporting period (item 4).

3) Legacy Wealth Management increased the maximum financial planning fee from up to $25,000 per year to up to $50,000 per year (See 4 and 5).

4) We have partnered with Halo Securities, LLC to offer annuity services (See item 10).

5) We have identified three entities, Tradebacked, Simplify and U.S. Energy, where Legacy Wealth Management receives a pecuniary benefit from its association with those funds. (See item 10).

6) We have identified four entities, Streamex, International Land Alliance, Sentinel and Lucent where control persons of LWM have significant interest in those entities. (See item 10).

7) We are disclosing additional entities that Legacy Wealth Management is doing business as. (Item 10).

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Item 4 Advisory Business

Description of Firm
Legacy Wealth Management, LLC ("Legacy"), is a registered investment adviser primarily based in Boise, ID. We are organized as a limited liability company ("LLC") under the laws of the State of Idaho. We have been providing investment advisory services since 02/01/2015. We are owned by Andy A. Rad and Peter C. Covino III. Additionally, Justin Martin acquired a minority interest in the company in 2024. Jefferson H. West is our Chief Compliance Officer. Paul Hickey was named as our CEO in 2025.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our," and "us" refer to Legacy Wealth Management, LLC and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Portfolio Management Services
We offer discretionary and non-discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we may customize an investment portfolio for you according to your risk tolerance and investing objectives or we may invest your assets according to one or more model portfolios developed by our firm.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. Such restrictions must be reasonable, as determined in our sole discretion.

We may also offer non-discretionary portfolio management services. If you enter into a nondiscretionary arrangement with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis. As part of our portfolio management services, we may use one or more sub-advisers and/or money managers ("MM") to manage a portion of your account on a discretionary basis. The sub-adviser(s) may use one or more of their model portfolios to manage your account. We will regularly monitor the performance of your accounts managed by sub-adviser(s) and may hire and fire any sub-adviser without your prior approval. We pay a portion of our advisory fee to the sub-adviser(s) we use.

As part of our portfolio management services, in addition to other types of investments (see disclosures below in this section), we may invest your assets according to one or more model portfolios developed by our firm. These models are designed for investors with varying degrees of risk tolerance ranging from a more aggressive investment strategy to a more conservative investment approach. Clients whose assets are invested in model portfolios may not set restrictions on the specific holdings or allocations within the model, nor the types of securities that can be purchased in the model. Nonetheless, clients may impose restrictions on investing in certain securities or types of securities in their account. In such cases, this may prevent a client from investing in certain models that are managed by our firm.

Financial Consulting Services
We offer financial consulting services that primarily involve advising clients on specific financial-related topics. The topics we address may include, but are not limited to, risk assessment/management, investment planning, financial organization, or financial decision making/negotiation.

Selection of Other Advisers
We may recommend that you use the services of a third-party money manager ("TPMM") to manage all, or a portion of, your investment portfolio. After gathering information about your financial situation and objectives, we may recommend that you engage a specific TPMM or investment program. Factors that we take into consideration when making our recommendation(s) may include, but are not limited to, the following: the TPMM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPMM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

Types of Investments
We primarily offer advice on Stocks, Bonds, Mutual Funds, ETFs, Options, Non-traded REITs, Private Placements, Structured Notes, Derivatives, and other Alternatives. Refer to the *Methods of Analysis, Investment Strategies and Risk of Loss* below for additional disclosures on this topic.

Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. You may request that we refrain from investing in particular securities or certain types of securities; however, you must provide these restrictions to our firm in writing.

Since our investment strategies and advice are based on each client’s specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

A portion of client portfolios may be allocated to alternative investments, including private placements, non-traded securities, and structured products. These investments may involve additional risks and conflicts of interest, as described elsewhere in this brochure.

Alternative investments may represent a meaningful portion of certain client portfolios.

IRA Rollover Recommendations
For purposes of complying with the DOL’s Prohibited Transaction Exemption 2020-02 (“PTE 2020-02”) where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are 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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);

- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Assets Under Management ("AUM")
As of end of year, 2025, we provide continuous management services for $629,031,199 which is a material change from the $476,513,737 we managed at the end of the previous year on a discretionary basis. The firm does not have accounts managed on a non-discretionary basis.

Item 5 Fees and Compensation

Portfolio Management Services
Our fee for portfolio management services is based on a percentage of your assets that we manage. Our advisory fees are negotiable and range from 0.0% to 2.50% of total assets. The basis for negotiating the advisory fees are dependent upon account sizes, family accounts, investment goals, risk tolerance, time horizon, clients' involvement and depth of the financial planning, and complexity of the strategy.

Our fees are currently billed and payable either quarterly in advance based on the value of your account on the last day of the previous quarter, or monthly in arrears based on the average value of your account for the month that is being billed.

If the portfolio management agreement is executed at any time other than the first day of a calendar quarter or calendar month, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter or month for which you are a client.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee when the following requirements are met:

You provide our firm with written authorization permitting the fees to be paid directly from your account held by the qualified custodian. The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from your account including the amount of the advisory fee paid directly to our firm. You may terminate the portfolio management agreement upon 15 days written notice to our firm.

You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter or month for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees. Any refunds will be sent by check to your address or reimbursed to your custodial account.

An investment adviser shall deliver materials, via internet web link or other means, required by this section to an advisory client or prospective advisory client at or before the time of entering into the contract. The client has the right to terminate the contract without penalty within five business days after entering into the contract. We will not require prepayment of a fee more than six months in advance.

Fee Schedule

The advisory fee and money management fees charged to you by Legacy are negotiable. The fee percentage is decided upon between you and your investment adviser representative and set forth in the Advisory Agreement signed upon opening an account with Legacy Wealth Management.

In general, fees are lower for larger dollar amounts. Fees can also differ due to the complexity of the portfolio. For example, fees may be higher when you utilize complex strategies, such as those strategies that employ options trading.

Except in situations involving a performance based fee arrangement, Legacy charges an annual fee of up to 2.50% on assets under management. The annual fee is made of an advisory fee, and a money-management fee, broken down as follows:

> Up to 2.0% Advisory Fee – This fee is charged for the advisory services provided by Legacy to the Client, this fee may be lower at the discretion of the adviser.
>
> Legacy may also charge a 0.50% fee as outlined in the Illiquid Direct Participation Program paragraph below.
>
> In situations that involve a performance based fee arrangement, the fee is negotiated between the client and the advisor. The parameters of this arrangement are outlined in item 6 below. Within those parameters, The client and advisor are free to negotiate a performance based fee up to 20%.

In the event a TPMM is used, there will a be money management fee charged by the TPMM, in addition to the advisory fee charged by Legacy. The TPMM's fee will vary based on the complexity of the strategies used. Legacy will use its discretion in selecting a TPMM and/or sub-adviser, utilizing fees charged by the TPMM or sub-adviser as a factor in deciding to use any third-party services. You will be made aware of the types and rates of fees charged by any third-party engaged by Legacy to manage all or a part of your accounts. In some cases, the third-party fees may be collected by Legacy on behalf of the TPMM and then sent to the TPMM.

Illiquid Direct Participation Program ("DPP") Investments
The maximum annual AUM fee assessed on DPP Investments is 0.50%. DPP investment offering structures may be private equity (for example, Regulation D, Regulation A, etc.), public non-traded offerings (for example, S-1 offerings, Intrastate offerings, Business Development Companies ("BDCs"), non-traded mutual funds, etc.), non-traded REITs, non-traded closed-end funds, or non-traded oil and gas programs. Legacy does not collect any additional compensation, from clients, outside of the 0.50% fee for alternative product investments. The adviser utilizes the value of illiquid investments on the last day of each calendar quarter for quarterly billings, and on the average monthly value for monthly billings, when such valuations are available.

The adviser uses the valuation of the investment or fund as published by the investment sponsor. In some instances, the adviser will use annual valuations published by the sponsors where quarterly valuations are not available. The adviser does not use any other method for valuing illiquid investments, such as published values on auction sites or secondary markets, tender offers by third parties or the investment sponsor, or valuations as published by third party research providers.

Investment sponsors vary on the timeliness of their valuation reporting, ranging from daily, monthly, quarterly, or annually – some do not update the valuation of their investment or fund until it has achieved a liquidity event. In all cases, the adviser uses the valuation available on the last day of each calendar quarter. The underlying or intrinsic value of an illiquid investment may be higher or lower than its published valuation. For example, the net operating income for an investment property may have increased, causing an increase in value of the property relative to the per share price for the real estate fund. Or, vacancies may have increased in an investment property, causing it to lose value relative to the fund per share price. Given the volatility of the valuation of the underlying investments, and the difficulty in assessing a real-time valuation, which would be speculative in nature, the adviser does not reconcile any differences between the fees it charges (as based on the investment sponsor's published valuation) and a potentially more accurate fee based on another method of valuation. Consequently, the adviser may charge a fee that is higher or lower than the fair market value of the underlying investments.

Financial Consulting Services
We can charge a fixed fee for financial planning and advisory services. Fixed fees are negotiable and up to $50,000 per year, per client, depending on the scope and complexity of services rendered. Our consulting fee is billed in two parts, the first half due at the beginning of the engagement and the second half due upon completion of the agreed upon planning and advisory services. Planning & advisory fees include an initial fee to design a financial plan and ongoing financial planning and advisory services. Our fees for ongoing financial planning and advisory services are offered though a monthly subscription which can be terminated by you at any time.

Financial planning services may be paid with a credit card, bank card, or check. For our subscription-based services, we do have options that can securely store payment information for automatic billing and payment.

You may terminate the financial planning agreement upon notice our firm. If you have pre-paid financial consulting fees that we have not yet earned, you will receive a prorated refund of those fees. If financial planning fees are payable in arrears, you will be responsible for a prorated fee based on services performed prior to termination of the financial planning agreement.

Additional Fees and Expenses
As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds, separately managed accounts, unit investment trusts, and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

Compensation for the Sale of Securities or Other Investment Products
Persons providing investment advice on behalf of our firm are licensed as independent insurance

agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Affiliate Conflicts of Interest
Certain investments recommended by LWM involve additional compensation or economic benefits to LWM or its affiliates. These arrangements create conflicts of interest. Please refer to Item 10 – Other Financial Industry Activities and Affiliations for additional information.

Different forms of compensation
LWM and its associated persons may receive multiple forms of compensation, including advisory fees, insurance commissions, and other economic benefits related to certain investment products, which creates conflicts of interest that we seek to address in the manner described in Item 10.

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

While it is infrequent, we do permit a qualified client to negotiate options for performance-based fees or participate in side-by-side management. A qualified client is a client that has 1.1 million under management with us or has 2.2 million net worth. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

An advisor may not charge more than 20% of the growth or performance of a qualified client's account, even if the client is willing to agree to more. Further, an advisor must exceed the high-water mark established from the previous high-water mark established in order to take a performance-based fee. The parties are free to negotiate a performance-based fee up to 20% of growth or performance.

Negotiation of a performance-based fee is separate and apart from any negotiation for a base advisory fee, if any, but such base advisory fee may not exceed 2% as identified above. None of these fees affect the .5% alternative fee identified above.

Item 7 Types of Clients

We offer investment advisory services to individuals (other than high net worth individuals), high net worth individuals, charitable organizations, limited liability companies, partnerships, and corporations and other business types not listed above.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively.

We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Our Methods of Analysis and Investment Strategies
We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Charting Analysis - involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

> **Risk:** Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Technical Analysis - involves studying past price patterns, trends and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

> **Risk:** The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

> **Risk:** The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions.

> **Risk:** The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Modern Portfolio Theory - a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets.

> **Risk:** Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

> **Risk:** Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Short-Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

> **Risk:** Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Short Sales - Unlike a straightforward investment in stocks where you buy shares with the expectation that their price will increase so you can sell at a profit, in a "short sale" you borrow stocks from your brokerage firm and sell them immediately, hoping to buy them later at a lower price. Thus, a short seller hopes that the price of a stock will go down in the near future. A short seller thus uses declines in the market to his advantage. The short seller makes money when the stock prices fall and loses when prices go up. The SEC has strict regulations in place regarding short selling.

> **Risk:** Short selling is very risky. Investors should exercise extreme caution before short selling is implemented. A short seller will profit if the stock goes down in price, but if the price of the shares increase, the potential losses are unlimited because the stock can keep rising forever. There is no ceiling on how much a short seller can lose in a trade. The share price may keep going up and the short seller will have to pay whatever the prevailing stock price is to buy back the shares. However, gains have a ceiling level because the stock price cannot fall below zero.

> **Risks:** A short seller must undertake to pay the earnings on the borrowed securities as long as the short seller chooses to keep the short position open. If the company declares huge dividends or issues bonus shares, the short seller will have to pay that amount to the lender. Any such occurrence can skew the entire short investment and make it unprofitable. The broker can use the funds in the short seller's margin account to buy back the loaned shares or issue a "call away" to get the short seller to return the borrowed securities. If the broker makes this call when the stock price is much higher than the price at the time of the short sale, then the investor can end up taking huge losses.

> **Risk:** Margin interest can be a significant expense. Since short sales can only be undertaken in margin accounts, the interest payable on short trades can be substantial, especially if short positions are kept open over an extended period.

> **Risk:** Shares that are difficult to borrow – because of high short interest, limited float, or any other reason – have “hard-to-borrow” fees. These fees are based on an annualized

rate that can range from a small fraction of a percent to more than 100% of the value of the short trade. The hard-to-borrow rate can fluctuate substantially on a daily basis; therefore, the exact dollar amount of the fee may not be known in advance, and may be substantial.

Margin Transactions - a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Risk: If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them.

Option Writing - a securities transaction that involves selling an option. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell a particular security at a specified price on or before the expiration date of the option. When an investor sells a call option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. When an investor sells a put option, he or she must pay the strike price per share if the buyer exercises the option, and will receive the specified number of shares. The option writer/seller receives a premium (the market price of the option at a particular time) in exchange for writing the option.

Risk: Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited.

Trading - We may use frequent trading (in general, selling securities within 30 days of purchasing the same securities) as an investment strategy when managing your account(s). Frequent trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk. This may include buying and selling securities frequently in an effort to capture significant market gains and avoid significant losses.

Risk: When a frequent trading policy is in effect, there is a risk that investment performance within your account may be negatively affected, particularly through increased brokerage and other transactional costs and taxes.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

Cash Management
In managing the cash maintained in your account, we utilize the sole exclusive cash vehicle (money market) made available by the custodian. There may be other cash management options away from the custodian available to you with higher yields or safer underlying investments.

Tax Considerations
Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss
Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Other Risk Considerations
When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining our services.

Liquidity Risk: The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price or it may not be possible to sell the investment at all.

Credit Risk: Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

Inflation and Interest Rate Risk: Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

Horizon and Longevity Risk: The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired, or are nearing retirement.

Recommendation of Particular Types of Securities
We primarily recommend Stocks, Bonds, Mutual Funds, ETFs, Options, Non-traded REITs, Private Placements, Structured Notes, Derivatives, and other Alternatives.

Municipal Securities: Municipal securities, while generally thought of as safe, can have significant risks associated with them including, but not limited to: the credit worthiness of the governmental entity that issues the bond; the stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same amount of interest or yield to maturity.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF’s performance to match that of its underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its underlying Index, or its weighting of investment exposure to such securities may vary from that of the underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the underlying Index, but which are expected to yield similar performance.

Real Estate Investment Trust: A real estate investment trust ("REIT") is a corporate entity which invests in real estate and/or engages in real estate financing. A REIT reduces or eliminates corporate income taxes. REITs can be publicly or privately held. Public REITs may be listed on public stock exchanges. REITs are required to declare 90% of their taxable income as dividends, but they actually pay dividends out of funds from operations, so cash flow has to be strong or the REIT must either dip into reserves, borrow to pay dividends, or distribute them in stock (which causes dilution). After 2012, the IRS stopped permitting stock dividends. Most REITs must refinance or erase large balloon debts periodically. The credit markets are no longer frozen, but banks are demanding, and getting, harsher terms to re-extend REIT debt. Some REITs may be forced to make secondary stock offerings to repay debt, which will lead to additional dilution of the stockholders. Fluctuations in the real estate market can affect the REIT's value and dividends.

Limited Partnerships: A limited partnership is a financial affiliation that includes at least one general partner and a number of limited partners. The partnership invests in a venture, such as real estate development or oil exploration, for financial gain. The general partner has management authority and unlimited liability. The general partner runs the business and, in the event of bankruptcy, is responsible for all debts not paid or discharged. The limited partners have no management authority and their liability is limited to the amount of their capital commitment. Profits are divided between general and limited partners according to an arrangement formed at the creation of the partnership. The range of risks are dependent on the nature of the partnership and disclosed in the offering documents if privately placed. Publicly traded limited partnership have similar risk attributes to equities, however, like privately placed limited partnerships their tax treatment is under a different tax regime from equities. You should speak to your tax advisor in regard to their tax treatment.

Options Contracts: Options are complex securities that involve risks and are not suitable for everyone. Option trading can be speculative in nature and carry substantial risk of loss. It is generally recommended that you only invest in options with risk capital. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an underlying asset at a specific price on or before a certain date (the "expiration date"). The two types of options are calls and puts:

A call gives the holder the right to buy an asset at a certain price within a specific period of time. Calls are similar to having a long position on a stock. Buyers of calls hope that the stock will increase substantially before the option expires.

A put gives the holder the right to sell an asset at a certain price within a specific period of time. Puts are very similar to having a short position on a stock. Buyers of puts hope that the price of the stock will fall before the option expires.

Selling options is more complicated and can be even riskier.

The option trading risks pertaining to options buyers are:

- Risk of losing your entire investment in a relatively short period of time.
- The risk of losing your entire investment increases if, as expiration nears, the stock is below the strike price of the call (for a call option) or if the stock is higher than the strike price of the put (for a put option).
- European style options which do not have secondary markets on which to sell the options prior to expiration can only realize its value upon expiration.
- Specific exercise provisions of a specific option contract may create risks.
- Regulatory agencies may impose exercise restrictions, which stops you from realizing value.

The option trading risks pertaining to options sellers are:

- Options sold may be exercised at any time before expiration.
- Covered Call traders forgo the right to profit when the underlying stock rises above the strike price of the call options sold and continues to risk a loss due to a decline in the underlying stock.
- Writers of Naked Calls risk unlimited losses if the underlying stock rises.
- Writers of Naked Puts risk substantial losses if the underlying stock drops.
- Writers of naked positions run margin risks if the position goes into significant losses. Such risks may include liquidation by the broker.
- Writers of call options could lose more money than a short seller of that stock could on the

same rise on that underlying stock. This is an example of how the leverage in options can work against the option trader.

- Writers of Naked Calls are obligated to deliver shares of the underlying stock if those call options are exercised.
- Call options can be exercised outside of market hours such that effective remedy actions cannot be performed by the writer of those options.
- Writers of stock options are obligated under the options that they sold even if a trading market is not available or that they are unable to perform a closing transaction.
- The value of the underlying stock may surge or decline unexpectedly, leading to automatic exercises.

Other option trading risks are:

- The complexity of some option strategies is a significant risk on its own.
- Option trading exchanges or markets and option contracts themselves are open to changes at all times.
- Options markets have the right to halt the trading of any options, thus preventing investors from realizing value.
- Risk of erroneous reporting of exercise value.
- If an options brokerage firm goes insolvent, investors trading through that firm may be affected.
- Internationally traded options have special risks due to timing across borders.

Risks that are not specific to options trading include market risk, sector risk and individual stock risk. Option trading risks are closely related to stock risks, as stock options are a derivative of stocks.

Private Placements: A private placement (non-public offering) is an illiquid security sold to qualified investors and are not publicly traded nor registered with the Securities and Exchange Commission.

> **Risk:** Private placements generally carry a higher degree of risk due to illiquidity. Most securities that are acquired in a private placement will be restricted securities and must be held for an extended amount of time and therefore cannot be sold easily. The range of risks are dependent on the nature of the partnership and are disclosed in the offering documents.

Structured Notes: a structured note is a debt security issued by financial institutions, with its returns based on equity indexes, a single equity, a basket of equities, interest rates, commodities, or foreign currencies.

> **Risks**: Issuing Bank credit worthiness; in the event a bank's credit is compromised the Structured Note holder may become a creditor. Structured notes lack liquidity and are not listed on any securities exchange and an investor may not be able to sell a structured note prior to maturity. Structured notes may be callable automatically or at the option of the issuer; if a note is called early, the investor will not receive any interest payments that would have been payable for the remainder of the note. Structured notes should be purchased with the intention of holding them until maturity. In the event there is an opportunity to sell the structured note on a secondary market, the structured note will be subject to the prevailing market conditions and may include transaction charges. The sale proceeds may be less than the original purchase amount paid. Unless noted, structured notes do not provide 100% principal protection, the degree of principal protection must be carefully reviewed by the investor. Structured notes are not FDIC insured.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management.

Legacy Wealth Management and certain of its associated persons are named as respondents/defendants in a pending arbitration and related civil matter.

Specifically, Legacy Wealth Management, LLC, along with Andy Rad and Peter Covino, are respondents in a FINRA arbitration filed by clients alleging, among other things, breach of fiduciary duty in connection with investment advisory services. The arbitration is pending before FINRA Dispute Resolutions Services as Arbitration No. 25-02282.

In addition, a related civil action was filed in the District Court of the Fourth Judicial District of the State of Idaho, in and for Ada County, Case No. CV01-25-15596. That matter is currently stayed pending resolution of the aforementioned arbitration.

These matters are currently pending, and the allegations have not been proven. The firm and the named individuals deny the allegations and intend to defend the matter.

Item 10 Other Financial Industry Activities and Affiliations

Arrangements with Affiliated Entities

Insurance Agency
We are affiliated with Legacy Peak Insurance Solutions, LLC, LPM Insurance & Agency, LLC, Eternity Financial Alliance and Insurance Solutions, Inc., Smart Financial Planning, LLC and Axiom Wealth Solutions, LLC, through common control and ownership. Therefore, persons providing investment advice on behalf of our firm may be licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. See the *Fees and Compensation* section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm. This affiliated firm is otherwise regulated by the professional organizations to which it belongs and must comply with the rules of those organizations. These rules may prohibit paying or receiving referral fees to or from investment advisers that are not members of the same organization.

Other Investment Advisers
We are affiliated with Legacy Investment Solutions, LLC, d.b.a., Ancorato through common control and ownership. Ancorato serves as a third-party money manager and/or sub-adviser for certain client accounts. We will recommend that you use the services of our affiliate if appropriate and suitable for your needs. Our advisory fees are separate and distinct from the fees paid to our affiliate for their services.

Where utilized, Ancorato may have discretionary authority to manage all or a portion of client assets pursuant to model portfolios or investment strategies. Legacy Wealth Management retains overall responsibility for client relationships, including initial suitability determinations, ongoing monitoring, and oversight of Ancorato's performance.

Legacy Wealth Management has a financial incentive to recommend Ancorato due to this affiliated relationship and the economic benefits derived from its use. This creates a conflict of interest, as Legacy may have an incentive to allocate client assets to Ancorato over unaffiliated managers.

Clients do not contract directly with Ancorato and should direct all communications regarding their accounts to Legacy Wealth Management.

Additional information regarding Ancorato, including its Form ADV Part 2A, is available upon request.

Related Accountant or Accounting Firm
We are affiliated with Blue Sky Tax Advisory, LLC, through common control and ownership. Additionally, wealth advisors that have their license with Legacy Wealth Management, LLC own and operate Phillips, Oakes, Goodwin, Crane and Co., PLLC, Navigator Business Solutions, LLC, JTC CPAs, LLP and Dunlap Wealth Management, P.C. If you require accounting services, we will recommend that you use the services of our affiliates. Our advisory services are separate and distinct from the compensation paid to our affiliate for their services. This affiliated firm is otherwise regulated by the professional organizations to which it belongs and must comply with the rules of those organizations. These rules may prohibit paying or receiving referral fees to or from investment advisers that are not members of the same organization. Some individuals associated with our firm are licensed Certified Public Accountants.

Outside Investment Managers
LWM is affiliated through common control and ownership with Elica Capital Investments, LLC ("Elica"). LWM may recommend investments sponsored by or affiliated with Elica. Elica receives management fees and other compensation in connection with such investments. As a result, LWM has a conflict of interest because it has an incentive to recommend these investments to clients. LWM addresses this conflict through disclosure and by evaluating such recommendations in accordance with its fiduciary duty to act in the best interest of clients.

Educational Events
LWM hosts periodic client and advisor educational events, which may include multi-day conferences or retreats. Third-party investment sponsors are invited to participate in these events and typically pay fees to attend and present their products or services. Sponsor payments may be used, in part, to offset the costs of hosting such events, including reducing the cost of attendance for clients. As a result, LWM has a conflict of interest, as it has an incentive to invite or feature sponsors who provide financial support for these events. In addition, clients receive a financial benefit in the form of subsidized event costs. LWM addresses these conflicts through disclosure and by selecting investment opportunities and sponsors based on its assessment of their suitability and relevance for clients, consistent with its fiduciary duty.

Attendance at such events is not conditioned on any investment, and clients are not required to invest in any sponsor-related products or services.

Third Party Annuity Service

<u>Halo Securities, LLC</u>
Legacy Wealth Management has partnered with Halo Securities, LLC. ("Halo") to offer annuity services. Halo facilitates new annuity sales and broker of record services on behalf of Legacy Wealth Management and its Clients. Halo employs FINRA and insurance-licensed sales representatives who are contracted with all carriers they represent.

Halo offers variable, indexed linked, indexed and fixed annuities from certain insurance companies. Halo can receive a commission of up to 150 basis points (1.5%) for each annuity sale. The commissions paid vary by product type and may vary by the insurance carrier. Additionally, Legacy Wealth Management may charge an advisory fee for annuities sold or receive an advisory fee for annuities supported in partnership with Halo. This practice presents a conflict of interest in recommending Clients engage Halo for annuity services. Legacy Wealth Advisory persons are not required to recommend Halo's annuity services. Clients are under no obligation to implement any recommendation from a Legacy Wealth Advisory person or to engage Halo.

Lawyer or Law Firm
We have three Individuals associated with the firm that are licensed attorneys. Two are licensed in the State of Idaho and one is licensed in the State of Hawaii.

Referral arrangements with an affiliated entity present a conflict of interest for us because we may have a direct or indirect financial incentive to recommend an affiliated firm's services. While we believe that compensation charged by an affiliated firm is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use the services of any firm we recommend, whether affiliated or otherwise, and may obtain comparable services and/or lower fees through other firms.
Affiliated Advisory Entities

Legacy Wealth Management, LLC is affiliated with the following advisory firms that are owned and operated by Investment Advisor Representatives that have their licenses with Legacy Wealth. These entities are Big Life Financial, LLC, Axiom Wealth Solutions, LLC, Legacy Integrated, LLC, Altura Private Wealth, LLC. Legacy Wealth Management, LLC is or will be doing business as the entities identified in this paragraph.

Firm-Level Economic Relationships (LWM receives compensation)

Tradebacked

LWM maintains a relationship with Tradebacked through an affiliate under which the affiliate may receive certain economic benefits, including fees or other compensation, for consultation on a Tradebacked related offering. This creates a conflict of interest because LWM has a financial incentive to recommend these offerings. LWM mitigates this conflict through its fiduciary duty to act in the best interest of clients and by considering multiple factors, including suitability and overall portfolio objectives, when making recommendations.

Simplify

LWM has an indirect economic relationship with Simplify through its affiliate, Ancorato. Ancorato may receive economic benefits, including a portion of management fees or other compensation, in connection with certain Simplify-related investment strategies or products. As a result of this relationship, LWM has a conflict of interest because it has an incentive to recommend or allocate client assets to such strategies. LWM addresses this conflict through disclosure and by evaluating all recommendations in accordance with its fiduciary duty to act in the best interest of clients.

U.S. Energy

LWM has a relationship with U.S. Energy and may receive economic benefits, including compensation tied to client investments in U.S. Energy-related offerings. This creates a conflict of interest, as LWM has a financial incentive to recommend such investments. LWM mitigates this conflict by adhering to its fiduciary obligations, conducting due diligence, and ensuring that any recommendations are consistent with the client's investment objectives and risk tolerance.

Control Person Financial Interests

Streamex

A control person of LWM, has a substantial financial interest in Streamex through equity ownership acquired through purchase and consulting arrangements. As a result, the control person may benefit financially from client investments in Streamex. LWM or its associated persons may recommend or allocate client assets to these investments, creating a conflict of interest because such recommendations may result in financial benefit to the control person. LWM addresses this conflict through disclosure and by evaluating all recommendations in accordance with its fiduciary duty to act in the best interest of clients.

ILAL

A control person of LWM has a financial interest in International Land Alliance, Inc. ("ILAL") through equity ownership acquired through purchase and consulting arrangements. As a result, the control person may benefit financially from client investments in ILAL. LWM or its associated persons may recommend or allocate client assets to these investments, creating a conflict of interest because such recommendations may result in financial benefit to the control person. LWM addresses this conflict through disclosure and by evaluating all recommendations in accordance with its fiduciary duty to act in the best interest of clients.

Sentinel

Legacy Portfolio Management, which is a company owned by control persons of LWM, purchased a meaningful interest in Sentinel. Additionally, one of our control persons purchased an even larger interest in his personal account. This arrangement creates a conflict of interest, as the control persons have a vested interest in this company and provides an incentive to recommend or allocate client assets to such investments. LWM addresses this conflict by evaluating all investment opportunities based on the client's best interest.

Lucent

A control person purchased a meaningful share of Lucent. This arrangement creates a conflict of interest, as the control person has a vested interest in this company and provides an incentive to recommend or allocate client assets to such investments. LWM addresses this conflict by evaluating all investment opportunities based on the client's best interest.

Conflict remediation
Due to the breadth of LWM's business activities, including relationships with affiliated entities, third-party investment sponsors, and insurance and annuity providers, LWM and its associated persons may have financial incentives that differ from client interests. LWM seeks to identify and disclose all material conflicts of interest and addresses such conflicts through disclosure, internal review processes, and its fiduciary obligation to act in the best interest of clients.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions
Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices
Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Aggregated Trading
Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("aggregated trading"). Refer to the *Brokerage Practices* section in this brochure for information on our aggregated trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

We recommend the brokerage and custodial services of Charles Schwab, Goldman Sachs, Community National Bank, FirstTrust Retirement, Mountain West IRA, Axos Clearing, LLC, NuView Trust, John Hancock, Voya, Principal Financial, Retire Better, American Funds and Mutual of Omaha (whether one or more "Custodian"). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere. Our selection of custodian is based on many factors, including the level of services provided, the custodian’s financial stability, and the cost of services provided by the custodian to our clients, which includes the yield on cash sweep choices, commissions, custody fees and other fees or expenses.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.

- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

Research and Other Soft Dollar Benefits
The firm does not maintain any soft dollar arrangements. From time to time representatives of the firm may attend due diligence or educational events sponsored by product providers. These events may include reimbursement of reasonable travel or lodging expenses. The firm does not direct brokerage in exchange for these benefits. These benefits create a potential conflict of interest, as they provide an incentive to recommend or utilize certain product providers.

In addition, as described in Item 10, LWM hosts certain educational events where third-party sponsors provide financial support, which may reduce costs for clients and create additional conflicts of interest.

Economic Benefits
As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

Charles Schwab
Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. Through Schwab Advisor Services, Charles Schwab and Company (CS&Co) provides us and our clients, both those enrolled in the Automated Investment Program ("Program") and our clients not enrolled in the Program, with access to its institutional brokerage services— trading, custody, reporting, and related services—many of which are not typically available to CS&Co. retail customers. However, certain retail customers may be able to get institutional brokerage services from Schwab without going through us. CS&Co. also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. CS&Co.'s support services described below are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CS&Co.'s products and services is not based on us giving particular investment advice, such as buying particular securities for
our clients. Here is a more detailed description of CS&Co.'s support services:

> CS&Co.'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. CS&Co.'s services described in this paragraph generally benefit the client and the client's account.

CS&Co. also makes available to us other products and services that benefit us but do not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CS&Co. In addition to investment research, CS&Co. 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; and
- assist with back-office functions, recordkeeping, and client reporting.

CS&Co. also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology and business consulting;
- consulting on legal and related compliance needs;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

CS&Co. provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CS&Co. also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. If your client did not maintain their account with Schwab, we would be required to pay for these services from our own resources.

The availability of services from CS&Co. benefits us because we do not have to produce or purchase them. We don't have to pay for these services, and they are not contingent upon us committing any specific amount of business to CS&Co. in trading commissions or assets in custody. With respect to the Program, we do not pay SPT fees for the Platform so long as we maintain client assets in accounts at CS&Co. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of CS&Co. as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality, and price of CS&Co.'s services and not Schwab's services that benefit only us.

Brokerage for Client Referrals
We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage
We routinely require that you direct our firm to execute transactions through Charles Schwab, Community National Bank, FirstTrust Retirement, Mountain West IRA, and NuView Trust. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

Aggregated Trades
We combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Generally, participating accounts will pay a fixed transaction cost regardless of the number of shares transacted. In certain cases, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given day. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in aggregated trading with your accounts; however, they will not be given preferential treatment.

We do not aggregate trades for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

Mutual Fund Share Classes
Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration cost, tax implications, and other factors. When the fund is available for purchase at net asset value, we will purchase, or recommend the purchase of, the fund at net asset value. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent deferred sales charges.

Item 13 Review of Accounts

Legacy's Investment Adviser Representatives and/or a Managing Member will monitor your accounts on an ongoing basis and will conduct account reviews at least annually, to ensure the advisory services provided to you are consistent with your investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals;
- year-end tax planning;
- market moving events;
- security specific events; and/or
- changes in your risk/return objectives.

The individuals conducting reviews may vary from time to time, as personnel join or leave our firm.

We will provide you with additional or regular written reports in conjunction with account reviews. Reports we provide to you will contain relevant account and/or market-related information such as an inventory of account holdings and account performance, etc. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s). You should review these custodial reports to ensure the accuracy of the information.

Legacy's Investment Adviser Representatives and/or a Managing Member will review financial plans as needed, depending on the arrangements made with you at the inception of your advisory relationship to ensure that the advice provided is consistent with your investment needs and objectives. Generally, we will contact you periodically to determine whether any updates may be needed based on changes in your circumstances. Changed circumstances may include, but are not limited to marriage, divorce, birth, death, inheritance, lawsuit, retirement, job loss and/or disability, among others. We recommend meeting with you at least annually to review and update your plan if needed. Additional reviews will be conducted upon your request. Such reviews and updates may be subject to our then current hourly rate. Written updates to the financial plan may be provided in conjunction with the review. You should anticipate having access to trade confirmations and at least a quarterly statement from your investments.

Item 14 Client Referrals and Other Compensation

As disclosed under the *Fees and Compensation* section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the *Fees and Compensation* section.

We directly compensate non-employee (outside) consultants, individuals, and/or entities (solicitors) for client referrals. In order to receive a cash referral fee from us, solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to us by a solicitor, you should have received a copy of this brochure along with the solicitor's disclosure statement at the time of the referral. If you become a client, the solicitor that referred you to us will receive a percentage of the advisory fee you pay us for as long as you are our client, or until such time as our agreement with the solicitor expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a solicitor are contingent upon your entering into an advisory agreement with us. Therefore, a solicitor has a financial incentive to recommend us to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain us for advisory services. Comparable services and/or lower fees may be available through other firms.

Solicitors that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We request that our solicitors disclose to you whether multiple referral relationships exist and that comparable services may be available from other advisers for lower fees and/or where the Solicitor's compensation is less favorable.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

Item 15 Custody

Legacy Wealth Management does not take physical custody of client funds or securities. Client assets are maintained with qualified custodians. However, the firm may be deemed to have custody in certain circumstances under the Investment Advisers Act of 1940. For example, custody may arise when an adviser representative serves as trustee for a client account, holds a power of attorney over a client account, or when advisory fees are deducted directly from client accounts with written authorization. In situations where custody exists, the firm complies with the applicable custody rule requirements, which may include undergoing an annual surprise examination by an independent public accountant.

You will also have access to statements that will reflect the amount of the advisory fee deducted from your account. You should compare our statements with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement, or if you did not receive a statement from your custodian, contact us immediately at the telephone number on the cover page of this brochure.

Item 16 Investment Discretion

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and the appropriate trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

If you enter non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Item 18 Financial Information

We have not filed a bankruptcy petition at any time in the past ten years.

The firm is currently SEC registered.

Item 19 Requirements for State-Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Trade Errors
In the event a trading error occurs in your account, our policy is to restore your account to the position

it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits
We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

IRA Rollover Considerations
As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer’s retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
    a. Employer retirement plans generally have a more limited investment menu than IRAs.
    b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
    a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 72.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.

    a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.