Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

LEGACY
CONSULTING GROUP

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This brochure provides information about the qualifications and business practices of Legacy Consulting Group. It is prepared pursuant to regulatory requirements. If you have any questions about the contents of this brochure, please contact us at the phone number or website listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Legacy Consulting Group is a registered investment adviser with the SEC under the Investment Advisers Act of 1940 (the "Advisers Act"). However, such registration does not imply a certain level of skill or training. Additional information about Legacy Consulting Group is also available on the SEC's website at www.adviserinfo.sec.gov.

Dated: March 26, 2024

Item 2 Material Changes

The purpose of this Item 2 is to provide clients with a summary of material changes that are made to this brochure since the last annual update.

Summary of Material Changes:

On March 26, 2024, we submitted our annual updating amendment filing for fiscal year 2023 and updated Item 4 of our Form ADV Part 2A Brochure to disclose discretionary assets under management of approximately $ 304,305,337 and non-discretionary assets under management of approximately $12,275,670.

Full Brochure Available

If you would like to receive a complete copy of our Form ADV Part 2 Brochure, please contact Jen Boling, Operations Manager at 972.599.4750 or jboling@legacyconsultinggroup.com.

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Item 4 Advisory Business

INTRODUCTION

Legacy CG, LLC, DBA Legacy Consulting Group, LLC ("LCG") is a Registered Investment Advisory firm registered with the U.S. Securities and Exchange Commission (SEC) since April 20, 2000. We are noticed filed in our home state of Texas which means we are authorized to do business in this state. We may conduct business in other states by claiming an exemption from registration. Our registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications we provide you, including this Brochure, is information you can use to evaluate us and other advisers, which are factors in your decision to hire us or to continue to maintain a mutually beneficial relationship. This Brochure provides information about our qualifications and business practices.

OWNERSHIP

Legacy Consulting Group, LLC, is a limited liability company. As of January 1, 2021, ownership of LCG is as follows: Steven G. Wachs 41.5%, Roger A. Shake 41.5% held through a personal trust, Matthew Quinn 5%, Jennifer Schmitt 5% held through a personal trust, Jennifer Boling 5%, and Kimberly Durdin 2%. Steven G. Wachs is President and Chief Compliance Officer, and Roger A Shake is Vice President, Secretary and Treasurer.

ADVISORY SERVICES OFFERED

LCG is an investment advisory firm providing:

- Portfolio Management Services
- Financial Life Planning Services
- Special Project and Review & Consulting Services

Our service constitutes an ongoing process by which:

a) Your investment objectives, constraints and preferences are identified and specified;
b) Your strategies are developed and implemented through a combination of financial assets;
c) Capital market conditions and your circumstances are monitored; and
d) Portfolio adjustments are made as appropriate to reflect changes to any or all the above relevant variables.

PORTFOLIO MANAGEMENT SERVICES:

We provide portfolio management services on either a discretionary or non-discretionary basis. Our portfolio management program is designed to provide you with the appropriate asset allocation, diversification, and risk characteristics consistent with portfolio management. Customized portfolio management services include portfolio design, quantitative and qualitative analysis, buy and sell recommendations, and portfolio rebalancing. The portfolio may include, but is not limited to, certain mutual funds purchased at net asset value (NAV) without paying any sales load. Selected stocks, exchange traded funds, bonds, and other securities can also be bought and sold.

On a discretionary basis, we design, revise, and rebalance a custom portfolio for you. Investment allocations are determined based upon your investment objectives, risk tolerance, investment time horizon, tax situation and other various suitability factors.

On a non-discretionary basis, we provide periodic recommendations to you and if such recommendations are approved, we will ensure that the authorized recommendations are carried out.

Custody of your accounts for both securities and funds will be maintained at a qualified designated custodian and clearing firm. Custody of client accounts for both securities and funds will be maintained at Charles Schwab & Co., Inc. ("Schwab") Member FINRA/SIPC, or other Trust companies.

FINANCIAL LIFE PLANNING SERVICES:

Designed to help you define what you want out of your life, and how your financial situation can be adjusted so that you can lead a happier, more inspired, fulfilling life. Depending on your situation, the scope of the service can be limited or very broad. Areas that are typically covered include identification of life goals and objectives, an estimate of assets, liabilities and net worth, investment portfolio analysis, financial independence, retirement income needs, income tax situation review, disability and capital needs analysis, education funding needs and an estimate of estate value and settlement costs.

On a broader scale, the plan may include advanced planning strategies to help you maximize your financial, social, and personal wealth. These planning features are designed to help minimize estate taxes, transfer assets to future generations, and provide for philanthropic and social causes of interest while retaining control and/or use of assets for your lifetime.

We gather the required information through in-depth personal interviews. Information gathered includes a current financial status, future goals, and attitudes towards risk. Related documents supplied by you and a completed questionnaire are carefully reviewed and a written report is prepared. Implementation of the prepared plan or recommendations is solely at your discretion and will also determine how you want to implement the plan or recommendations.

Review and Renewal

Implementing the Client's Financial Life Plan is essential to achieving their goals. Equally important is the need to take periodic measurements to determine the Client's progress while maintaining the flexibility to respond to changes that occur in each situation. Our Review and Renewal process will involve an ongoing rotation of reviewing your Estate Planning, Risk/Insurance Management, Life Goals, Financial Independence and Wealth Management objectives, and Investment Risk Assessment. Depending on the complexity of the Client's situation, Legacy Consulting Group will meet with the Client on a monthly, quarterly, semi-annual, annual, or in some cases, a less frequent basis.

SPECIAL PROJECTS:

From time to time, you may need assistance with special projects. This could involve, but is not limited to, projects such as estate settlement , divorce, and separation of assets consultation, set up of retirement plans, discussion and implementation of charitable gifting strategies, business consulting, etc.

ASSETS UNDER MANAGEMENT:

As of December 31, 2023, we manage discretionary assets under management of $304,305,337 and non-discretionary assets under management of $12,275,670.

Item 5 Fees and Compensation

PORTFOLIO MANAGEMENT PROGRAM FEE SCHEDULE:

In exchange for our portfolio management services described, you will pay an annualized fee according to the following schedule:

Account Balances	Annual Charge
Of the first $1,000,000	1.00%
Of the next $500,000	0.95%
Of the next $500,000	0.90%
Of the next $3,000,000	0.80%
Of the next $2,000,000	0.75%
Over $7,000,000	Negotiable

All stated fees are intended as standards and may in some cases be subject to negotiation when, in our opinion, such negotiation is in the best interest of all parties involved.

Since we only bill at the beginning of a quarter, the initial portfolio management fee is determined on a combination of pro-rated amounts for the prior quarter based on the value of assets when deposited into the account(s) and the value of the account(s) at the end of the quarter.
The Client authorizes and directs Legacy Consulting Group, or other authorized firms, to automatically debit the fee payable from the account(s). Legacy Consulting Group reviews the fee calculation to be debited. All fees will be noted on the Client's statements. The Client will pay the fee quarterly, in advance. Portfolio Management fees listed above will be directly deducted from your account at the custodian quarterly in advance. Prorated fee adjustments will be made for any deposits or withdrawals over $25,000. We send the qualified custodian written notice of the amount of the fee to be deducted from your account(s).

Accounts for new clients are charged at the end of the initial period in arrears and in advance for the next quarter, based on the value of the account on the last business day of the calendar quarter. All flows into these accounts for the initial quarter are charged on a pro rata basis and based on actual days in the calendar quarter. The first fee paid by the client may appear larger as it combines two quarters.

Clients are advised they may pay their proportionate share of the fund's management and administrative fees. The mutual funds available through this investment advisory program are also available directly from the Funds, and without the additional ongoing fees of this service.

At your request, we shall provide written notice/invoice documentation reasonably supporting the determination of the investment advisor fees. The Custodian will send to you either a paper or electronic monthly account statement that shows the amount of our advisory fee. If statements are not received, contact us immediately.

Additional Types of Fees or Expenses:
Custodian may charge transactions cost. These are not considered commissions. There are clearing costs charged by the designated clearing firm on the account. In addition, the custodian may charge a Non-Standard Asset (NSA) fee to purchase and provide custody for Non-Liquid Assets. We may elect at our option to bear the cost of transactions under certain circumstances. Portfolio Management fees do not include cost of custodial services for individual retirement accounts or qualified retirement plans.

Termination:
You will receive a prorated refund of any pre-paid quarterly fee, based upon the number of days remaining in the quarter after the termination date. No fee adjustments will be made for Account appreciation or depreciation.

The Agreement may be terminated at any time, by either party immediately upon receipt of 30 days' prior written notification from one party to the other. In the case that we receive written notice of the termination of the Agreement, we to the best of our ability will fulfill any specific instructions in the written notice.

FINANCIAL LIFE PLANNING FEE SCHEDULE:
The fee for Financial Life Planning is as follows:

- Year one planning fee is $3,000 per quarter. The first quarterly payment is due upon execution of an Advisory agreement. Year one typically involves five (5) meetings and requires a higher level of time and planning team involvement.

- Year two planning fee is reduced to $1,500 per quarter. Year two involves at least two (2) meetings for continued planning, implementation, and follow up of the appropriate strategies.

- Year three begins our Review and Renewal process. This is billed at an ongoing rate of $750 per quarter. In limited situations, both the meeting schedule and amount may be modified.

SPECIAL PROJECTS FEE SCHEDULE:
After discussion, determination, and definition of the project parameters, we will provide an estimated cost for the project. The project fee range is between $250 and $500 per hour based on which team members are involved.

IRA Rollover Considerations
As a normal extension of financial advice, we provide education or recommendations related to the rollover of an employer-sponsored retirement plan. A plan participant leaving employment has several options. Each choice offers advantages and disadvantages, depending on desired investment options and services, fees and expenses, withdrawal options, required minimum distributions, tax treatment, and the investor's unique financial needs and retirement plans. The complexity of these choices may lead an investor to seek assistance from us.

An Associated Person who recommends an investor roll over plan assets into an Individual Retirement Account ("IRA") may earn an asset-based fee as a result, but no compensation if assets are retained in the plan. Thus, we have an economic incentive to encourage an investor to roll plan assets into an IRA. In most cases, fees and expenses will increase to the investor as a result because the above-described fees will apply to assets rolled over to an IRA and outlined ongoing services will be extended to these assets.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interests and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

Other Compensation Received:
Some of our Advisory Agents are registered representatives of Perryman Securities, Inc. (Member FINRA/SIPC). In this capacity, our advisory agents may sell securities through Perryman Securities, Inc. and receive normal and customary commissions as a result of such purchases and sales. This presents a conflict of interest to the extent that the advisory agent recommends that you invest in a security which results in a commission being paid to the advisory agent.

Some of our Advisory agents are also licensed insurance agents for various insurance companies. If you elect to implement the plan or buy insurance through us or our Advisory agents, then the agents would receive a commission from insurance sales, which includes life, accident, disability and fixed annuities. This presents a conflict of interest because they will receive a commission for these services, which is separate from the portfolio management, financial planning and other services provided. We have no single agreement with any agency or company, but will seek out the products of any company, agency or brokerage that may have products fitting our client's needs. Clients to whom the firm offers advisory services are informed that they are under no obligation to purchase insurance services. Clients who do choose to purchase insurance services are under no obligation to use our licensed Associated Persons and may use the insurance brokerage firm and agent of their choice.

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

We do not charge performance-based fees, nor do we provide side by side management services.

Item 7 Types of Clients

Client Base:
Our client base consists of individuals, trusts, estates, charitable organizations, and other business entities. These are the types of clients that we service, but we may not have all these types as current clients.

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

Methods of Analysis, Investment Strategies and Risk of Loss:
Our customized portfolio management services are rooted in rigorous investment analysis and portfolio design, implementation, and rebalancing services. Combined, our research and analysis methods described in more detail below provide the foundation of our due diligence process. Due diligence refers to the care that a reasonable person exercises to avoid harm to other persons. Since all investments have the potential for loss, we have developed a due diligence process that combines quantitative investment analysis with fundamental research and our own qualitative judgement based on decades of experience. Our overriding goal is to optimize longer term investment outcomes rather than maximize shorter term investment returns.

The core of most client investment portfolios is comprised of mutual funds, exchange traded funds (ETFs), and individual stocks. We utilize a variety of methods to analyze these investments for inclusion in client investment portfolios:

- Our **quantitative research** process focuses primarily on analyzing data provided by various third-party research platforms such as YCharts and Morningstar. This analysis not only focuses on various past time-period returns, but also looks at statistical characteristics of investments. For mutual funds and ETFs, we also look at underlying fund expenses and tax efficiency. The goal of this part of the due diligence process is to identify funds with characteristics we would be comfortable owning for the long term, have provided investors with favorable risk-adjusted returns, and can be implemented effectively from both a cost and after-tax standpoint.
- Our **qualitative research** process focuses more on the background of the investment firm, specific fund manager and a more in-depth review of the manager’s strategy, philosophy, process, and positioning. We also review underlying allocations, diversification trends, and investment-specific risks. While we receive most of this information by reviewing readily available fund reporting documents, we also generally request a due diligence questionnaire or proposal and set up a conference call to review the fund with a portfolio manager or specialist. We also seek to identify the types of investment environments that may be favorable for the manager.
- For individual stocks, we conduct more **technical analysis** to inform us about investor sentiment. Standard technical measures we evaluate include momentum (using 20-day and 200-day moving averages) and relative strength. We also conduct more **fundamental analysis** to inform us about quality and value. Quality focuses on a review of the company’s balance sheet, profitability ratios, and growth potential. Value focuses on valuation multiples such as enterprise value to EBITDA and price to book value relative to the stock’s past multiples and relative to industry peers. In terms of investment strategies, we work with clients to develop personalized investment plans based on their unique needs and circumstances. This includes a review of a client’s risk tolerance, investment objectives, constraints, liquidity needs, and time horizon. While underlying client circumstances may be unique, we believe investment portfolios can be built around varying levels of risk tolerance and outcome priorities. As such,

investment portfolios are generally anchored around five capital allocation models ranging from the most conservative (capital preservation) to the most aggressive (high growth). Focusing on risk also allows us to consider a wider range of investment strategies. While we have a general preference for active investment strategies, we do consider passive strategies when and where appropriate.

We believe a more sophisticated capital allocation process should be driven by prospective longer-term return assumptions across the risk spectrum. Maintaining discipline should ultimately improve the quality of decisions and we believe ultimately leads to better long-term outcomes for investors. The capital allocation process today is complex, as investors have virtually an unlimited number of investment options to consider. General market sentiment can also move quickly from a risk-on to risk off market environment. While we are not market timers, at times we may pursue certain types of shorter-term trading strategies.

We generally describe our portfolios as being progressive in nature. Progressive as an adjective describes something that is moving forward, happening or developing gradually over time, and is using or is interested in using new or modern ideas. In addition to following a longer-term investment approach and focusing on security specific risks, we seek to minimize the risk of loss associated with owning a limited number of securities by diversifying the portfolio among different types of assets. We also spend time analyzing correlations between various investments to optimize capital allocation decisions and utilize investment strategies that are non-correlated to further diversify risks within investment portfolios. In addition to more traditional investments such as stocks, bonds, and cash, we also use various alternative investment strategies. We believe this approach allows us to be more dynamic and opportunistic within a well-defined framework.

Risk of Loss:
The advice offered by our Firm to you is determined by the areas of expertise of the advisor providing the service and your stated objective. You are advised to notify us promptly if there are ever any changes in your financial situation or investment objective or if you wish to impose any reasonable restrictions upon our management services.

We do not represent, warrant, or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. All securities trading, whether in stocks, or other investment vehicles, is speculative in nature and involves substantial risk of loss that you should be prepared to bear. Past performance is not necessarily indicative of future results. You should make every effort to understand the risks involved.

All investments have the potential for gain or loss. Different types of investments involve higher and lower levels of risk. There is no guarantee that a specific investment or strategy will be profitable for an investor's portfolio. There are no assurances that an investment or strategy will match or exceed any benchmark. Performance returns for investments indexes and/or categories, usually do not deduct transaction and/or custodial charges or an advisory fee, which would decrease performance results.   Asset allocation and diversification will not necessarily improve an investor's return and cannot eliminate the risk of investment losses.

The Principles Risks of Investing include, but are not limited to:

General Risks: Your investments with us are not a deposit of a bank and are not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Accordingly, you may lose money by investing with us. When you sell your investments, they may be worth less than what you paid for them because the value of investments will fluctuate reflecting day-to-day changes in market conditions, interest rates and a number of other factors.

Allocation Risk: Our allocation of investments among different asset classes, such as equity or fixed-income assets classes, may have a more significant effect on your returns when one of these classes is performing more poorly than others.

Market Risk: Stock and bond markets often trade in random price patterns, and prices can fall over sustained periods of time. The value of the investments we make for you will fluctuate as the financial markets fluctuate. This could result in your account value(s) declining over short or long-term periods of time.

Focused and Concentrated Portfolio Risks: We may invest in non-diversified funds that take a focused or concentrated approach. Accordingly, the money that is managed in this manner may have more volatility and is often considered to have more risk than a strategy that invests in a greater number of securities because changes in the value of a single security may have a more significant effect, either negative or positive, on the portfolio value. Your assets are subject to greater risk of loss if any of those securities become permanently impaired.

Equity Risk: Your investments will be subjected to the risk that stock prices may fall over short or extended periods of time. Historically, the equity markets have moved in cycles, and the value of equity securities in your portfolio may fluctuate from day to day. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. These factors will contribute to the volatility and risk of your assets.

Special Situation Risk: We may invest your assets in special situations. Investments in special situations may involve greater risks when compared to other strategies due to a variety of factors.

Expected changes may not occur, or transactions may take longer than originally anticipated, resulting in lower returns than contemplated at the time of investment. Additionally, failure to anticipate changes in the circumstances affecting these types of investments may result in permanent loss of capital, where we may be unable to recoup some or all of its investment.

Foreign Securities Risk: Foreign investments involve greater risk in comparison to domestic investments because foreign companies/securities: may have different auditing, accounting, and financial reporting standards; may not be subject to the same degree of regulation as U.S. companies, and may have less publicly available information than U.S. companies; and are often denominated in a currency other than the U.S. dollar.

Currency Risk: Your investments may be subject to currency risk. Currency fluctuations and changes in the exchange rates between foreign currencies and the U.S. dollar could negatively affect the value of your investments in foreign securities.

Interest Rate Risk: Your investments are subject to interest rate risk. Interest rate risk is the risk that the value of a security will decline because of a change in general interest rates. Investments subject to interest rate risk will usually decrease in value when interest rates rise. For example, fixed-income securities with long maturities typically experience a more pronounced change in value when interest rates change.

Credit Risk: Your investments are subject to credit risk. An investments credit quality depends on its ability to pay interest on and repay its debt and other obligations.

Small- to Medium-Capitalization Risk: We may invest your assets in small to medium sized companies. Shares of small to medium sized companies may have more volatile share prices. Furthermore, the securities of small to medium companies often have less market liquidity and their share prices can react with more volatility to changes in the general marketplace.

Junk Bond/High-Yield Security Risk: We may invest your assets in Junk Bonds or High-Yield, lower rated securities. Investments in fixed-income securities that are rated below Investment grade can be subject to greater risk of loss of principal and interest than investments in higher-rated fixed-income securities. The market for high yield securities may be less liquid than the market for higher-rated securities. High yield securities are also generally considered to be subject to greater market risk than higher-rated securities. The capacity of issuers of high yield securities to pay interest and repay principal is more likely to weaken than is that of issuers of higher-rated securities in times of deteriorating economic conditions or rising interest rates.

Prepayment Risk: Your investments may be subject to prepayment risk. Prepayment risk occurs when the issuer of a security can repay principal prior to the security's maturity. Securities subject to prepayment can offer less potential for gains during a declining interest rate environment and similar or greater potential for loss in a rising interest rate environment. In addition, the potential impact of prepayment features on the price of a security can be difficult to predict and result in greater volatility.

Inflation Risk: This is the risk that the value of your assets or income will be less in the future as inflation decreases the value of your money. As inflation increases, the real value (purchasing power) of your assets can decline. This risk increases as we invest a greater portion of your assets in fixed-income securities with longer maturities.

Liquidity Risk: Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing us from selling out of these illiquid securities at an advantageous price.

Illiquid Securities: Illiquid securities involve the risk that investments may not be readily sold at the desired time or price. Securities that are illiquid, that are not publicly traded and/or for which no market is currently available may be difficult to purchase or sell, which may impact the price or timing of a transaction. An inability to sell securities can adversely affect an account's value or prevent an account from taking advantage of other investment opportunities. A client may not be able to liquidate its investment in the event of an emergency or any other reason.

Risks Associated with Investing in Buffer ETFs: Buffer ETFs are also known as defined-outcome ETFs since the ETF is designed to offer downside protection for a specified period of time. These ETFs are modeled after options-based structured notes, but are generally cheaper, and offer more liquidity. Buffer ETFs are designed to safeguard against market downturns by employing complex options strategies. Buffer ETFs typically charge higher management fees that are considerably more than the index funds whose performance they attempt to track. Additionally, because buffer funds own options, they do not receive dividends from their equity holdings. Both factors result in the underperformance of the Buffer ETF compared to the index they attempt to track. Clients should carefully read the prospectus for a buffer ETF to fully understand the cost structures, risks, and features of these complex products.

Potential risks of investing in interval funds: Interval funds are illiquid, closed-end versions of a mutual fund. There are particular risks with investing in interval funds that are generally not associated with open ended mutual funds.

<u>Interval Funds are Illiquid, Long-Term Investments</u>
Interval funds do not provide daily liquidity. Redemption requests are accepted quarterly, and in the event of a full redemption, a portion of the value may be held-back pending completion of the fund's annual audit. Additionally, a substantial portion of the fund's investments are illiquid and therefore the fund itself imposes limitations on investor withdrawals. The fund will only allow a limited number of shares to be redeemed through the share repurchase program, which is subject to the discretion of the Board of Trustees of the interval fund. Due to this illiquidity these types of investments are intended for investors who are able to hold these investments for the long term.

<u>Interval Funds May Invest in Private Funds</u>
Investing in private securities carries a variety of risks that are embedded in the interval fund when it makes such private investments. Private Funds are not registered with the Securities and Exchange Commission and may not be registered with any other regulatory authority. Accordingly, they are not subject to certain regulatory restrictions and oversight to which other issuers are subject. There may be little public information available about their investments and performance. Moreover, as sales of shares

of private investment companies are generally restricted to certain qualified purchasers, it could be difficult for a client to sell its shares of a private investment company at an advantageous price and time. Since shares of private investment companies are not publicly traded, from time to time it may be difficult to establish a fair value for the client's investment in these companies. Private Funds often engage in leveraging and other speculative investment practices that increases the risk of investment loss. A Private Fund's performance can be volatile. An investor could lose all or a substantial portion of his or her investment. There may be no secondary market for the investor's interest in the fund. Private Funds can be highly illiquid and there may be restrictions on transferring interests in the fund. Private Funds are not required to provide periodic pricing or valuation information to investors. Private Funds may have complex tax structures. There may be delays in distributing important tax information. Private Funds are not subject to the same regulatory requirements as mutual funds. Private Funds often charge high fees. The fund's high fees and expenses may offset the fund's trading profits.

<u>Interval Funds Can Hold Investments That Are Difficult to Value</u>
A portion of the portfolio holdings in our funds may be difficult to value because they are not quoted daily or traded on any financial market or exchange. As such, valuation adjustments only occur quarterly and are generally not available until six weeks after the quarter close. Additionally, due to the nature of interim valuation methods employed by investment managers, the realized value of an underlying holding may differ from its carrying value at the time the investment is sold.

<u>Interval Funds May Use Leverage</u>
Our interval funds are permitted to use leverage (i.e., debt) in connection with certain investments or participate in investments with highly leveraged capital structures. Although the use of leverage may enhance returns and increase the number of investments that can be made, leverage also involves a high degree of financial risk and increases the exposure of such investments to factors such as rising interest rates, downturns in the economy or deterioration in the condition of the assets underlying such investments. Leverage can also amplify losses.

Structured Notes: Below are some specific risks related to the structured notes recommended by our firm:

- Complexity: Structured notes are complex financial instruments. Clients should understand the reference asset(s) or index(es) and determine how the note's payoff structure incorporates such reference asset(s) or index(es) in calculating the note's performance. This payoff calculation may include leverage multiplied by the performance of the reference asset or index, protection from losses should the reference asset or index produce negative returns, and/or fees. Structured notes may have complicated payoff structures that can make it difficult for clients to accurately assess their value, risk and potential for growth through the term of the structured note. Determining the performance of each note can be complex and this calculation can vary significantly from note to note depending on the structure. Clients should carefully read the prospectus for a structured note to fully understand how the payoff on a note will be calculated and discuss these issues with our firm.

- Market risk: Some structured notes provide for the repayment of principal at maturity, which is often referred to as "principal protection." This principal protection is subject to the credit risk of the issuing financial institution. Many structured notes do not offer this feature. For structured notes that do not offer principal protection, the performance of the linked asset or index may cause clients to lose some, or all, of their principal. Depending on the nature of the linked asset or index, the market risk of the structured note may include changes in equity or commodity prices, changes in interest rates or foreign exchange rates, and/or market volatility.
- Issuance price and note value: The price of a structured note at issuance will likely be higher than the fair value of the structured note on the date of issuance. Issuers now generally disclose an estimated value of the structured note on the cover page of the offering prospectus, allowing investors to gauge the difference between the issuer's estimated value of the note and the issuance price. The estimated value of the notes is likely lower than the issuance price of the note to investors because issuers include the costs for selling, structuring, and/or hedging the exposure on the note in the initial price of their notes. After issuance, structured notes may not be re-sold on a daily basis and thus may be difficult to value given their complexity.
- Liquidity: The ability to trade or sell structured notes in a secondary market is often very limited, as structured notes (other than exchange-traded notes known as ETNs) are not listed for trading on securities exchanges. As a result, the only potential buyer for a structured note may be the issuing financial institution's broker-dealer affiliate or the broker-dealer distributor of the structured note. In addition, issuers often specifically disclaim their intention to repurchase or make markets in the notes they issue. Clients should, therefore, be prepared to hold a structured note to its maturity date or risk selling the note at a discount to its value at the time of sale.
- Credit risk: Structured notes are unsecured debt obligations of the issuer, meaning that the issuer is obligated to make payments on the notes as promised. These promises, including any principal protection, are only as good as the financial health of the structured note issuer. If the structured note issuer defaults on these obligations, investors may lose some, or all, of the principal amount they invested in the structured notes as well as any other payments that may be due on the structured notes.

Item 9 Disciplinary Information

We do not have any material facts about legal or disciplinary events that are material to your evaluation of the integrity of our firm or its advisory agents to disclose. Your confidence and trust placed in our Firm and its advisory agents is something we value and endeavor to protect.

Item 10 Other Financial Industry Activities and Affiliations

Relationship with Perryman Securities, Inc.

Some of our advisory agents are registered representatives of Perryman Securities, Inc., (Member FINRA/SIPC). In this capacity, our advisory agents may when they deem suitable, recommend and sell securities through Perryman Securities, Inc. and receive normal and customary commissions as a result of such purchases and sales. This presents a conflict of interest to the extent that the advisory agent recommends that you invest in a security which results in a commission being paid to the advisory agent. Normally less than five hours a month is spent on these activities.

Other Financial Industry Relationships:
Some of our advisory agents are also licensed insurance agents for various other unaffiliated insurance companies. If you elect to implement the plan or buy insurance through us or our advisory agents, then the agents would receive a commission from the insurance sales, which includes life, accident, disability and fixed annuities. This presents a conflict of interest because they will receive a commission for these services, which is separate from the portfolio management, financial planning and other services provided. We have no single agreement with any agency or company, but will seek out the products of any company, agency or brokerage that may have products fitting our client's needs.

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

Code of Ethics:

We have adopted a Code of Ethics Policy to prohibit conflicts of interest from personal trading by our advisory personnel and have established standards of conduct expected of our advisory personnel. We have set forth in the Code of Ethics Policy statements of general principles, required course of conduct, reporting obligations, and review and enforcement of the Code of Ethics Policy. We will provide a copy of the Code of Ethics Policy to our clients or prospective clients upon written request.

Participation or Interest in Client Transactions / Personal Trading:
Some of our advisory agents are also registered securities representatives of Perryman Securities, Inc. (Member FINRA/SIPC), a non-affiliated registered broker-dealer. The advisory agents will receive compensation from Perryman Securities, Inc. in connection with security transactions effected for the accounts the advisory agents direct through the broker dealer. In addition, these advisory agents who are registered representatives of Perryman Securities, Inc. may receive ongoing trail commissions on selected securities. Therefore, there may be a financial incentive to use Perryman Securities, Inc. to effect certain security transactions for client accounts.

Our advisory agents may buy or sell for themselves securities that we also recommend to you. These investment products will be bought and sold on the same basis as you buy them. We will do everything possible to mitigate these conflicts. Records of all advisory associate’s proprietary trading activities are reviewed and kept by us. We and our advisory agents will act in a fiduciary manner, understand the prohibitions against the use of any insider information and will always act in your best interest.

Item 12 Brokerage Practices

Custodian(s) and Broker(s) We Use

LCG does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer, bank, or trust company, for example. We routinely recommend that our clients use Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian.

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account Agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client Referrals and Other Compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can still use other brokers to execute trades for your account as described below (see "Your Brokerage and Custody Costs").

How We Select Brokers/Custodians

When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payments, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services

- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below

Your Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, certain mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. In addition to transaction fees, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we will have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodians"). By using another broker or dealer you may pay lower transaction costs.

Research and Other Soft Dollar Benefits

Although the following products and services are not purchased with "soft dollar" credits, we will receive certain economic benefits (soft dollar benefits) from Schwab in the form of access to Schwab's institutional brokerage and support services at no additional cost or a discounted cost. Below is a detailed description of Schwab's support services:

Products and Services Available to Us from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab 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. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us.

Services that Benefit You: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that Do Not Directly Benefit You: Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your 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 a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients' accounts
- assist with back-office functions, recordkeeping, and client reporting

Services that Generally Benefit Only Us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and compliance-related needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support
- Recruiting and custodial search consulting

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment for our personnel. If you did not maintain your account with Schwab, we would be required to pay for those services from our own resources.

LCG understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all LCG clients and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While LCG may not always obtain the lowest commission rate, LCG believes the rate is reasonable in relation to the value of the brokerage and research services provided.

Our Interest in Schwab's Services
The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services.

Schwab has also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf once the value of our clients' assets in accounts at Schwab reaches certain thresholds.

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 your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us.

Directed Brokerage
LCG allows clients to direct brokerage. LCG will be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage to a broker dealer that does not have an existing relationship with our firm. Directed brokerage arrangements may result in higher overall costs because, without the ability to direct brokerage, LCG will not be able to aggregate orders to reduce transactions costs. This may result in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

Brokerage for Client Referrals:
Neither our Firm nor our Advisory Agents receive client referrals from a broker dealer or other third party when recommending to you a broker-dealer for the execution of securities transactions.

Neither this Firm nor our advisory agents receive any products, research, or services other than those disclosed.

Trade Aggregation (Block Trading):
We provide investment management services to various clients. We may, in our sole discretion, aggregate purchases or sales of any security, instrument or obligation effected for various client accounts with purchases or sales, as the case may be, of the same security, instrument or obligation effected on the same day for the accounts of one or more of our other clients. Although such concurrent aggregations potentially could be either advantageous or disadvantageous to any one or more accounts, they will be affected only when we believe that to do so will be in the best interest of the affected accounts. When transactions are so aggregated, (a) the actual prices applicable to the aggregated transaction will be averaged, and each client account participating in the aggregated transaction will be deemed to have purchased or sold its share of the security, instrument or obligation involved at that average price. Costs for such transactions will follow the normal fee

schedule for each account involved in the transaction. When such concurrent aggregation occurs, the objective will be to allocation executions in a manner that is deemed equitable to the accounts involved.

Item 13 Review of Accounts

Account reviews may be conducted quarterly but no less than annually or by your request. Reviews may be warranted more frequently due to tax law changes, market changes, market conditions or changes in personal circumstances. Reviews initiated by you may be for personal objectives or for any reason you so desire. The reviews will be conducted for accuracy, completeness and suitability by Steven Wachs, Roger Shake, Matt Quinn, or Jennifer Schmitt, and will be consistent with desires of you respecting frequency and changing circumstances or objectives.

Statements, confirmations, and performance reports are furnished from various financial services institutions or firms with which you transact business. These firms may include, and are not limited to, brokerages, investment companies, insurance companies, trust companies, other registered investment advisors, banks, and credit unions.

Item 14 Client Referrals and Other Compensation

As described in Item 12 above, we receive 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. The availability of Schwab's products and services is not dependent upon or based on the specific investment advice we provide our clients, such as buying or selling specific securities or specific types of securities for our clients. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

Our advisory agents receive economic benefits from Perryman Securities, Inc., various mutual fund and insurance companies, third party manager Platforms, and other financial entities. Our policy is to permit all advisory agents to accept such benefits to the extent that they are usual and customary within the industry and in compliance with the Securities and Exchange Commission, FINRA, or state rules, regulations or guidelines concerning the receipt of such benefits. Legacy Consulting Group, in accordance with FINRA regulations, generally must recognize compensations and report them to the Internal Revenue Service as revenues.

Advisory agents who are Registered Representatives of Perryman Securities, Inc. receive trail commissions (i.e. 12b-1 fees) which are initially paid to Perryman Securities, Inc. and a portion passed to the advisory agent for a period of time. Loaded mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. The 12b-1 fees come from fund assets, therefore, indirectly from client assets. The receipt of such fees could represent an incentive for advisory agents to recommend funds with 12b (1) fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

As part of our fiduciary duty to you, we will always endeavor to put the interests of you first. You should be aware, however, that the receipt of economic benefits by us and our advisory agents in and of itself creates a potential conflict of interest.

Client Referrals

Wealthtender

We have entered into an advertising agreement with Wealthtender, Inc. whereby Wealthtender, Inc. provides us with online advertising services in exchange for a flat monthly marketing fee. The services include advertising space on Wealthtender, Inc.'s website (https://wealthtender.com/), visibility on their online search tools and the provision of other electronic marketing materials. Potential clients using the Wealthtender, Inc. site may select and choose to contact our Associated Persons for services.

Item 15 Custody

Legacy Consulting Group is deemed to have custody of client funds because of the fee deduction authority granted by clients. Additionally, in accordance with the SEC's no action guidance to the Investment Adviser Association, dated February 21, 2017, Legacy Consulting Group is deemed to have custody because certain clients have given the firm a standing letter of authorization for third party transfers. In lieu of a surprise audit, we will adhere to the safeguards outlined in the above referenced no action guidance.

All client accounts are held with a bank, broker-dealer, or other qualified custodian. Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. Clients are urged to review custodial account statements for accuracy. The custodial statement is the official record of your account for tax purposes.

Item 16 Investment Discretion

Unless otherwise negotiated, you have granted our Firm discretion in the management of your portfolio and periodic re-balancing. In the exercise of authority, we are fully authorized and empowered to place orders to brokers, dealers, mutual funds, or other persons with respect to the purchase, sale, exchange, disposition or liquidation of any assets held in your portfolio.

Additionally, you are advised that:

1. You may set parameters with respect to when an account should be rebalanced and set trading restrictions or limitations;
2. When advisory agents are acting as registered representative for Perryman Securities, we must obtain written client consent to establish any mutual fund, variable annuity, or brokerage account;
3. We require the use of our broker/dealer for sales in commissionable mutual funds or variable annuities;

Discretionary authorization will not extend to the withdrawal of client funds or securities, with the exception of payment of our advisory fee.

We have limited authority to sell or redeem securities holdings in sufficient amounts to pay advisory fees. You may reimburse the portfolio for Advisory Fees paid to us.

Item 17 Voting Client Securities

We do not vote your proxies and have instructed the Custodian to forward all proxy material directly to you. You can contact our office at 972-599-4750 for any questions about a solicitation.

Item 18 Financial Information

We do not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance. We do not have any financial condition that is reasonably likely to impair the ability to meet contractual commitments to you.

Item 19 Requirements for State Registered Advisors

Not applicable, we are an SEC registered investment adviser.