

FORM ADV**Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

OMB Number: 3235-0049
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Hours per response... 4.07

Name of Investment Adviser:

Strategic Legacy Advisors, Inc.

Address: (Number and Street)

875 South 48th Street

(City)

Lincoln

(State)

NE

(Zip Code)

68510

Area Code: Telephone Number:

(402) 434-2442

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.**

FORM ADV

Part II - Page 2

Applicant:

Strategic Legacy Advisors, Inc.

SEC File Number:

801-65923

Date:

09/14/2010

1. A. Advisory Services and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service.
(See instruction below.)

Applicant:

- | | | | |
|-------------------------------------|-----|---|--------------|
| <input type="checkbox"/> | (1) | Provides investment supervisory services | _____ % |
| <input type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | _____ % |
| <input type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | _____ % |
| <input type="checkbox"/> | (4) | Issues periodicals about securities by subscription | _____ % |
| <input type="checkbox"/> | (5) | Issues special reports about securities not included in any service described above | _____ % |
| <input type="checkbox"/> | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | _____ % |
| <input type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | _____ % |
| <input type="checkbox"/> | (8) | Provides a timing service | _____ % |
| <input checked="" type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | <u>100</u> % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term?

Yes No
☒ ☐

C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input checked="" type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV**Part II - Page 3**

Applicant:

Strategic Legacy Advisors, Inc.

SEC File Number:

801- **65923**

Date:

09/14/2010**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | I. Options contracts on: |
| <input type="checkbox"/> (3) foreign issues | <input type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | J. Futures contracts on: |
| | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> C. Corporate debt securities
(other than commercial paper) | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> D. Commercial paper | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input checked="" type="checkbox"/> (1) real estate |
| <input checked="" type="checkbox"/> F. Municipal securities | <input checked="" type="checkbox"/> (2) oil and gas interests |
| | <input type="checkbox"/> (3) other (explain on Schedule F) |
| G. Investment company securities: | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (1) variable life insurance | |
| <input checked="" type="checkbox"/> (2) variable annuities | |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|---|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options, uncovered
options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV**Part II - Page 4**

Applicant:

Strategic Legacy Advisors, Inc.

SEC File Number:

801-65923

Date:

09/14/2010**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?

Yes No
☐ ☒

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|--|
| • name | • formal education after high school |
| • year of birth | • business background for the preceding five years |

7. Other Business Activities. (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☒ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.....

Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV**Part II - Page 5**

Applicant:

Strategic Legacy Advisors, Inc.

SEC File Number:

801- **65923**

Date:

09/14/2010**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes ☐ No ☒

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

See Schedule F.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

See Schedule F.

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

FORM ADV**Part II - Page 6**

Applicant:

Strategic Legacy Advisors, Inc.

SEC File Number:

801-65923

Date:

09/14/2010**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold?

Yes No

☐ ☒

(2) amount of the securities to be bought or sold ?

Yes No

☐ ☒

(3) broker or dealer to be used ?

Yes No

☐ ☒

(4) commission rates paid?

Yes No

☐ ☒

B. Does applicant or a related person suggest brokers to clients?

Yes No

☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients?

Yes No

☒ ☐

B. directly or indirectly compensates any person for client referrals?

Yes No

☐ ☒

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?

Yes No

☐ ☒**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Strategic Legacy Advisors, Inc.	801- 65923	09/14/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Strategic Legacy Advisors Inc.	IRS Empl. Ident.No.: 47-0822723
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Item of Form (identify)	Answer
Part II, Page 2, Item 1.D.	<p>Advisory Services and Fees</p> <p>Strategic Legacy Advisors, Inc. (hereinafter "SLA" the "Company") offers personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities. Individuals associated with SLA will provide these investment advisory services. All of these associates are appropriately licensed, qualified and authorized to provide advisory services on behalf of SLA. Such individuals are referred to as Investment Advisor Representatives (IARs).</p> <p>SLA is a corporation formed under the laws of the State of Nebraska. This Schedule F narrative provides clients with information regarding SLA and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory client of the Firm. The information in this Schedule F has not been approved or verified by the United States Securities and Exchange Commission, or by any State Securities authority.</p> <p>Please contact Myron (Mike) A. Owens, President and Chief Compliance Officer if you have any questions about this Schedule F narrative. Additional information about SLA is also available on the Internet at "www.adviserinfo.sec.gov". You can search this site by a unique identifying number known as a CRD number. The CRD number for SLA is 135786.</p> <p>The services offered by SLA include the Family Legacy Coach System and and the Referral of Clients to Outside Managers. SLA has several approaches to its investment advisory business. When investment advice is included the client signs our appropriate investment advisory agreement. When investment advice is provided, generic investment products may be included within the written plans. Specific types of investment products may be recommended during the implementation phase.</p> <p>Each of these services and their respective fees are described in greater detail below.</p> <p><i>The Family Legacy Coach System</i></p> <p>A portion of SLA's business is to provide clients with a written financial plan in conjunction with the Family Legacy Coach System involving, but not limited to, business continuity planning, estate planning, retirement planning and/or investment planning. These services are generally referred to as total financial planning and may or may not include investment advice.</p> <p>This process and result is exclusively for the client that has a tremendous love for family, an appreciation for the success they have achieved thus far in life, a strong sense of values, and practices good stewardship. A client who selects financial planning services signs our Family Legacy Coach System agreement.</p> <p>This process consists of six steps:</p> <ol style="list-style-type: none">1. The Legacy Advisor Method.2. The Discovery of Values Process3. The Legacy Advisor Strategy4. The Unique Legacy Solution5. The Legacy Network Approach6. My Unique Legacy Model

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Strategic Legacy Advisors, Inc.	801- 65923	09/14/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Strategic Legacy Advisors Inc.		IRS Empl. Ident.No.: 47-0822723
Item of Form (identify)	Answer	
	<p>SLA charges a fixed fee for this service that ranges from \$500 for the simplest plans to \$15,000 for the most comprehensive plans. Such fees are payable in advance of services rendered. After the entire Family Legacy Coach System process has been completed, the fee will not be refundable.</p> <p><i>Referral to Outside Managers</i> SLA has entered into agreements which enable the Firm or its Representatives to refer clients to outside managers for asset allocation or investment management services. While SLA has entered into agreements with an outside money manager, Anchor Capital Management, Inc. which is not affiliated with SLA. SLA may add additional relationships as needed. Clients are provided with SLA's Form ADV Part II as well as the outside manager's Form ADV Part II and any additional required disclosure information.</p> <p>Once a client has signed a contract with a third party provider, compensation may be paid to SLA and/or SLA representatives in exchange for introducing clients to the third party provider and/or for providing ongoing consultations with clients. The fees paid by clients to third party providers are generally a percentage of assets under management. Such fees are set out in the third party provider's contract and ADV Part II.</p> <p><i>General Information about Advisory Services, Fees and other Important Information</i> All fees paid to the Adviser for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. Such fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, a client may pay an additional or deferred sales charge.</p> <p>A client could invest in a mutual fund directly, without the services of the Adviser. In that case, the client would not receive the services provided by the Adviser, which are designed, among other things, to assist the clients in determining which mutual fund or funds are most appropriate to the client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by the Adviser to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.</p> <p>Clients can terminate, without penalty, the Adviser's Agreement within five business days. Thereafter, the client can serve written notice. Clients will then receive, where applicable, a prorated refund of any prepaid advisory fees. Such prorated refund will be based upon actual services and termination costs incurred up to and at the time of termination of the Adviser's services.</p> <p>Clients will have the opportunity to place reasonable restrictions on the types of investments that will be made on the client's behalf. Clients will retain individual ownership of all securities.</p>	
Part II, Page 3, Item 3L.	<p>Types of Investments</p> <p>SLA reserves the right to advise clients on any other type of investment that it deems appropriate, based on the client's stated investment goals, investment temperament, and investment objectives. SLA may also provide advice on any type of investment held in a client's portfolio at the inception of</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Strategic Legacy Advisors, Inc.	801- 65923	09/14/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Strategic Legacy Advisors Inc.		IRS Empl. Ident.No.: 47-0822723
Item of Form (identify)	Answer	
	the advisory relationship and will explore other investment options at the client's request.	
Part 2, Items 4. A (5), 4. B (8) and Item 4. C (7)	<p>Methods of Analysis, Sources of Information and Investment Strategies</p> <p>SLA will utilize analysis and information provided by its relationships with external managers in implementing various investment decisions.</p> <p>Although margin transactions are not generally used as a core investment strategy, SLA and its IARs may occasionally recommend this strategy if the IAR determines that it is suitable given the client's stated investment objectives.</p>	
Part II, Page 5, Item 6	<p>Education and Business Standards</p> <p>Myron (Mike) A. Owens, CLU, ChFC, RFC Year of Birth: 1955 Formal Education: *Chartered Life Underwriter, The American College, 1989 *Chartered Financial Consultant, The American College, 1991 *Registered Financial Consultant, Independent Association of Registered Financial Consultants, 1999 Business Background for the previous five years: *Strategic Legacy Advisors Inc., co-founder, President, and Chief Compliance Officer, 02/2006 to present *QA3 Financial Corporation, Registered Representative 02/2001 to 10/2009 *Girard Securities, Inc., Registered Representative 10/2009 to Present</p> <p>Dwain L. Owens, CLU, ChFC, RFC Year of Birth: 1960 Formal Education: *Chartered Life Underwriter, The American College *Chartered Financial Consultant, The American College *Registered Financial Consultant, Independent Association of Registered Financial Consultants, 1999 Business Background for the previous five years: *Sr. Vice President, Co-founder, Strategic Legacy Advisors Inc. *QA3 Financial Corporation, Registered Representative and Principal, 02/2001 to 10/2009 Girard Securities, Inc, Registered Representative and Principal 10/2009 to Present</p> <p>Royce T. Ruth, RFC Year of Birth: 1970 Formal Education: *Bachelor of Science in Business. University of Nebraska at Kearney, 1992 *Registered Financial Consultant, Independent Association of Registered Financial Consultants, 1999 Business Background for the previous five years: *Executive Vice-President, Strategic Legacy Advisors Inc. *QA3 Financial Corporation, Registered Representative 02/2001 to 10/2009 *Girard Securities, Inc, Registered Representative 10/2009 to Present</p>	
Part II, Page 4, Item	Other Business Activities/Other Financial Industry Affiliations	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Strategic Legacy Advisors, Inc.	801- 65923	09/14/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Strategic Legacy Advisors Inc.		IRS Empl. Ident.No.: 47-0822723
Item of Form (identify)	Answer	
7.A. and 7.B. Part II, Page 4, Item 7.C	<p>In addition to providing investment advisory services, SLA also provides business plans and business consulting services. SLA expects that clients to whom it offers advisory services may also be clients for whom business plans and/or business consulting services are provided. The fees paid to SLA for its investment advisory services are separate and distinct from fees earned for providing business plans and business consulting services. Clients to whom the Firm offers advisory services are informed that they are under no obligation to use the Firm for its IARs for business plans and/or business consulting services.</p> <p>SLA is also an insurance agency. IARs are also licensed insurance agents and, as such, are involved with the sale and servicing of life insurance products for various companies. If a client elects to purchase recommended insurance products through associated persons of SLA in their separate capacity as licensed insurance agents, such agents will receive normal and customary commission based on that insurance company's compensation schedule. As such, a potential conflict of interest may exist between the interests of SLA, its IARs and the interests of the client.</p> <p>Strategic Legacy Advisors' principal executive officers and/or its IARs may also be registered representatives of Girard Securities, Inc., ("Girard") and may recommend securities products offered through Girard. If Client purchases a security through Girard, the selling party may receive a commission. The Client is under no obligation to purchase security products recommended by principal executive officers and/or IARs of Strategic Legacy Advisors Inc. If the Client implements the plan through related persons who are registered representatives, Client may be limited to those products or services available through Girard. Commissions may be higher or lower at Girard than other broker/dealers. Girard will collect, as paying agent for Strategic Legacy Advisors, the advisory fee remitted to Strategic Legacy Advisors Inc. and will retain a portion as a charge to Strategic Legacy Advisors Inc. (and not the Client) for the supervisory function that Girard is required to carry out by FINRA and SEC. This fee will not increase execution or brokerage charges to the Client or the fee the Client has agreed to pay Strategic Legacy Advisors pursuant to the Clients advisory agreement</p> <p>Myron (Mike) Owens, Dwain Owens and Royce Ruth are also shareholders in Strategic Planning Inc. which serves as a brokerage insurance agency, and are also shareholders in Kalos Investment Insights, a company that they founded to provide morally responsible investment screening and education. Each shareholder spends approximately 100 hours per year in each company. Myron (Mike) Owens and Royce Ruth also own Strategic Planning Partners LLC. to which they each devote 25 hours per year.</p>	
Part II, Page 5. Items 9 B. and	<p>Participation or Interest in Client Transactions</p> <p>SLA's representatives may, in their capacities as registered representatives of Girard Securities, Inc., effect transactions for customers. If Client purchases a security through Girard, the selling party may receive a commission. The Client is under no obligation to purchase security products recommended by principal executive officers and/or IARs of Strategic Legacy Advisors Inc.</p> <p>SLA or individuals associated with the Firm may buy or sell for their personal accounts-investment products identical to those recommended to clients. It is the express policy of SLA that no person employed by the Firm may purchase or sell any security prior to a transaction being implemented for an advisory account, and therefore, preventing such employees from benefiting from such transactions placed on behalf of advisory accounts.</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Strategic Legacy Advisors, Inc.	801- 65923	09/14/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Strategic Legacy Advisors Inc.		IRS Empl. Ident.No.: 47-0822723
Item of Form (identify)	Answer	
	<p>As these situations may represent a conflict of interest, SLA has established a firm wide code of ethics, the full text of which is available to clients and prospective clients upon request, and which includes the following:</p> <ul style="list-style-type: none"> * Associated persons or their immediate families shall not buy or sell securities for their personal portfolios where their decision is derived in whole or in part, by reason of the associated person's employment, unless the information is also available to the investing public upon reasonable inquiry. No associated person of the Firm shall prefer his or her own interest to that of the advisory client. * Records will be maintained of all securities bought or sold by the Firm, associated persons of the Firm, and related entities. Myron (Mike) Owens, President and Chief Compliance Officer, will review these records on a regular basis. * The Firm requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered advisory practices. <p>Notes: This investment policy has been established recognizing that some securities being considered to purchase and/or sale on behalf of SLA clients trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. The foregoing does not apply to certain types of securities, such as obligations of the U.S. Government, and shares in open-end mutual funds. Open end mutual funds are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds by Advisory Representatives are not likely to have an impact on the prices of the fund shares in which clients invest.</p> <p>In accordance with Section 204-A of the Investment Advisers Act of 1940, SLA also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by SLA or any person associated with SLA.</p>	
Part II, Page 5, Items 11 A and B	<p>Review of Accounts and Reports to Customers</p> <p>Client accounts are reviewed at the client's request, at the IARs discretion, or as required by the signed agreement for services, with a minimum review conducted at least quarterly. Reviewers include Myron Owens, Royce Ruth and Dwain Owens.</p> <p>Clients receive a quarterly report from the custodian of their assets, which shows the beginning and ending balance, the transactions during the time period, any deposits and withdrawals and the deduction of the advisory fee.</p>	
Part II, Page 6, Item 12. B.	<p>Investment or Brokerage Discretion</p> <p>SLA will recommend that a Client in need of brokerage and custodial services utilize Pershing, LLC member FINRA/SIPC ("Pershing"). Pershing is the clearing firm of Girard Securities, Inc. ("Girard"), the broker/dealer with which SLA's investment advisory representatives are separately registered as registered representatives. When recommending a broker/dealer, SLA will attempt to minimize the total cost for all brokerage services paid by the Client. It may be the case that the recommended broker charges a higher fee than another broker charges for a particular type of service,</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Strategic Legacy Advisors, Inc.	801- 65923	09/14/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Strategic Legacy Advisors Inc.		IRS Empl. Ident.No.: 47-0822723
Item of Form (identify)	Answer	
	<p>such as commission rates. Clients may utilize the broker/dealer of their choice; and they have no obligation to purchase or sell securities through such broker as SLA recommends.</p> <p>SLA has adopted a policy on selecting brokers and dealers which requires that "best execution", adherence to fiduciary duty and compliance with the law are paramount considerations in selecting a broker or dealer to effect transactions for Client accounts. "Best execution" means obtaining for the Client the lowest total cost (in purchasing a security) or highest total proceeds (in selling a security), taking into account the circumstances of the transaction and the reputability and reliability of the executing broker or dealer. In determining whether a particular broker or dealer is likely to provide best execution in a particular transaction, SLA considers all factors that it deems relevant to the broker's or dealer's execution capability, including, for example, price, the size of the transaction, the nature of the market for the security, the amount of the commission, the timing of the transaction in light of market prices and trends, the reputation, experience and financial stability of the broker or dealer, and the quality of service rendered by the broker or dealer in other transactions.</p> <p>In the case where the Client chooses Girard Securities as their broker/dealer, the IAR may be paid commissions for transactions through Girard. As a registered representative of Girard, the IAR may receive services from Girard, which are customarily provided to representatives of Girard. Other than the commissions paid by the Client, there are no additional charges to the Client by Girard for services received by IARs. Commissions paid by the Client to Girard will be determined according to, or discounted from, standard commission rates in effect at Girard.</p> <p>Directed Brokerage Some Clients may instruct SLA to use one or more particular brokers for the transactions in their accounts. Clients who may want to direct SLA to use a particular broker should understand that this may prevent SLA from effectively negotiating brokerage compensation on their behalf. This arrangement may also prevent SLA from obtaining the most favorable net price and execution. Thus, when directing brokerage business, Clients should consider whether the commission expenses and execution, clearance and settlement capabilities that they will obtain through their broker are adequately favorable in comparison to those that SLA would otherwise obtain for its Clients. Clients are encouraged to discuss available alternatives with their advisory representative.</p>	
Part II, Page 6, Item 13A.	<p>Additional Compensation</p> <p>Associated persons of SLA may also receive other non-cash incentives based on their reaching certain levels of production in their capacities as insurance agents. Associated persons may sell insurance products, including, but not limited to, life health, disability and long term care products and may receive additional compensation from the sale of such products in the form of commissions.</p> <p>While SLA endeavors at all times to put the interest of the client first, as part of its fiduciary duty, clients should be aware that receipt of additional compensation itself creates a potential conflict of interest.</p>	
	<p>Proxy Voting SLA does not vote proxies on behalf of its clients, and will not be required to take any action or render any advice in respect to voting of proxies.</p> <p>Class Action Lawsuits</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of
Form ADV**

Continuation Sheet for Form ADV Part II

Applicant:	SEC File Number:	Date:
Strategic Legacy Advisors, Inc.	801- 65923	09/14/2010

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Strategic Legacy Advisors Inc.		IRS Empl. Ident.No.: 47-0822723
Item of Form (identify)	Answer	
	<p>From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. SLA has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. SLA also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore SLA has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct or negligence by corporate management of issuers whose securities are held by clients.</p> <p>Confidentiality SLA views protecting its customers' private information as a top priority and, pursuant to the requirements of Gramm-Leach-Bliley Act, the Firm has instituted policies and procedures to ensure that customer information is kept private and secure. SLA does not disclose any nonpublic information about its customers or former customers to non-affiliated third parties, except as permitted by law. In the course of servicing a client's account, SLA may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants and lawyers. It has always been and will always be that SLA will never sell information about current or former customers or their accounts to anyone. A copy of SLA's privacy policy notice will be provided to each client prior to or at the time of the execution of the advisory agreement. If you have any question on this policy, please contact Myron (Mike) Owens.</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).