

Investment Advisor Brochure

Legacy Planning Group

Item 1 - Cover Page

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This brochure provides information about the qualifications and business practices of Legacy Planning Group, Inc. If you have any questions about the contents of this brochure, please contact us at 801-207-1400 or info@investlpg.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration with the SEC does not imply a certain level of skill or training.

Additional information about Legacy Planning Group, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2- Material Changes From Previous Version:

Update to Item 5: Included the fees that Pershing may charge for those accounts not enrolled in Paperless/E-Delivery services.

Update to Item 10: LPG associated individuals may conduct Mortgage Origination business.

You may request a copy of this brochure by contacting Michael Owen, Chief Compliance Officer at (801) 207-1400 or mowen@investlpg.com. Our brochure is also available online on our web site www.investlpg.com

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Item 4- Advisory Business:

A) Legacy Planning Group, Inc. (LPG) is an independently owned, SEC-Registered Investment Advisor. The firm is headquartered and maintains its sole office in Midvale, UT. The firm was originally established in the fall of 2003 as a DBA name for owners/partners Michael Child, Travis Hudak and David James. However, in Oct 2008 it was registered as an investment advisor.

B) LPG offers investment supervisory services and financial planning services, where appropriate to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations or other business entities. LPG provides continuous advice to a client regarding investment of client's funds based on the individual needs of the client. LPG consults with the client to obtain detailed financial information and other pertinent data, including a personal financial statement or detailed listing of overall finances, to enable the Investment Advisor to determine the appropriate investment guidelines. LPG uses risk tolerance and other factors to ascertain the suitability of investments in each client's account. Account supervision is guided by the stated objectives of the client (i.e., Preservation of Principal, Income, Income and Growth, Growth, and Speculation) as indicated in the Managed Investment Advisory Service Agreement which must be completed by the client.

C) LPG will create a portfolio which typically consists of one or all of the following: stocks, bonds, mutual funds, exchange traded funds (ETF's), variable annuities, fixed annuities, REITS, Limited Partnerships and other investment products. LPG will allocate client assets among various investments taking into consideration the overall management style or objective selected by the client. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Therefore, performance of portfolios within the same

investments objective may differ and clients should not expect the performance of their portfolios to be identical with other clients of LPG. Clients will retain individual ownership of all securities purchased in their accounts.

D) L P G a l s o provides advice in the form of a Financial Plan. Clients purchasing this service will receive a written report, providing a detailed financial plan designed to achieve his or her stated financial goals or objectives. In general, the financial plan will address areas of concern including, but not limited to, preparation of a Statement of Net Worth, capital needs analysis, tax and cash flow planning, retirement planning and education planning. In order to facilitate a financial plan LPG gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes toward risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and then a written report is prepared. Financial recommendations are not limited to any specific product or service offered by a particular broker-dealer or insurance company. All recommendations are generic in nature. Whenever possible, and if the client wishes, LPG would be available to assist in the implementation of the financial plan. Once the financial plan is presented to the client, implementation of the financial plan recommendations is entirely at the client's discretion. LPG charges a non-negotiable financial planning fee of \$150 per hour. An estimated fee will be provided at the inception of the advisory relationship, based on the estimated hours for completion. In the alternative, a fixed fee amount may be negotiated for the completion of the entire financial plan based on the scope of the financial plan being requested by the client. All fees are due and payable upon completion and delivery of the

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financial plan. Financial Planning fees may be offset against the management fee of any LPG Investment Supervisory Service account client.

E) As of December 31, 2011 's assets under management are \$41,595,094 million of which \$0.00 are non-discretionary.

Item 5- Fees and Compensation:

A) The annual fee for LPG's Investment Supervisory Services will be charged as a percentage of assets under management (hereafter "AUM") along with an annual account fee of \$50 per annum. This account fee may be waived solely at the discretion of LPG. The following schedule identifies the AUM fees charged by LPG:

<i>Account Size</i>	<i>Quarterly</i>	<i>Annual</i>
< \$100,000	0.6250%	* 2.50%
\$100,001 to \$250,000	0.5000%	2.00%
\$250,001 to \$500,000	0.4375%	1.75%
\$500,001 & \$1,000,000	0.3750%	1.50%
\$1,000,001 & above	0.3125%	1.25%

* Fees above 2% may be considered excessive. The same or similar services may be obtained in the market place for a lower fee. Smaller accounts managed by LPG, with the above listed AUM fee schedule, may find their performance negatively impacted by the higher fees charged, therefore, these clients should consider all other options for investing, prior to establishing a managed account with LPG. In addition to AUM fees, clients may be responsible for an additional charge of up to 0.25% per annum of AUM for clearing and administration fees, otherwise clients will be responsible for all

clearing charges associated with the management of their account including, but not limited to, purchases and sales of securities. Please review the clearing fee schedule below for our brokerage custodian:

Clearing Fee Schedule:

Equity orders \$20.50 + \$0.01 share

Options \$23.50 + \$1.00 per contract

Transaction-fee Mutual Funds \$12.50 per transaction and \$8.00 per exchange

Bonds \$43.50 for Principal transactions and \$23.50 for Agency transactions

UIT's \$38.50 per transaction

Note-Clearing Fees will be paid directly to the Clearing Firm (i.e, Pershing LLC)

Pershing may also charge up to \$0.75 per statement/confirmation for those accounts not enrolled in Paperless/E-Delivery services.

B) Management fees are negotiable depending on the types of investments and degree of involvement required for each client's circumstances. LPG will quote an exact percentage to the client, based on both the nature and total dollar value of that account. LPG may group certain related client accounts for the purpose of determining the AUM fee. Friends, family, LPG's IARs, and certain charitable organizations may be given a discounted AUM fee, at the sole discretion of LPG. In addition, from time to time clients may request LPG's IARs to transfer and manage investments purchased through other institutions or firms. Those purchases may have cost the client a sales load or charge. In the event that LPG is willing to supervise and manage such investments for the client, LPG may waive AUM

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fees for a period of three years from original date of purchase. However, it is the client's responsibility to inform LPG of such charges and any decision to waive the AUM fee is solely at the discretion of LPG. Fees will be directly debited from client accounts in arrears, at the beginning of each quarter, based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous quarter. In the event the custodian will not allow such direct compensation, LPG will directly invoice the client, in arrears, at the beginning of each quarter based upon the value (market value or fair market value in the absence of market value) of the client's account at the end of the previous quarter. Clients may also elect to have AUM fees for multiple accounts deducted from one primary account, to avoid having some fees deducted and some fees directly invoiced. However, fees directly billed will be due and payable upon receipt of the billing invoice. Clients who terminate their advisory account agreement will be responsible for AUM fees earned prior to the date of termination.

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

LPG does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Therefore this section does not apply.

Item 7- Types of Clients:

LPG provides portfolio management and advisory services primarily to individuals, but may also serve small businesses, pensions, trusts, charitable organizations, and corporations. LPG does not have a required minimum account size, however smaller accounts managed by LPG may find their performance negatively impacted by the higher fees charged. Therefore, these clients should consider all other options for investing, prior to establishing a managed account with LPG.

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

A) Legacy Planning Group, Inc. uses a combination of technical and fundamental methods to assess risks and opportunities in capital markets. Fundamental data helps us identify industries and sectors with compelling financial characteristics. Technical data helps us identify securities with attractive supply-demand characteristics. We apply technical and fundamental economic and stock analysis to determine appropriate investments and timing of buys and sells. Our investment strategies may use index-related funds, closed-end funds, and ETFs to profit from the market's intermediate trend. We determine the trend based on one or more market signals.

We may also include mutual funds and income-generating investments to balance and diversify the portfolios, or to respond to specific client objectives. We choose mutual funds based on investment style, long-term fund performance, reasonableness of cost, and a fund's history of respect for the needs of individual investors, including their fiduciary record.

B) Our investment strategies attempt to profit from the stock market's overall trends. We are seeking the intermediate trend, a trend that lasts 3 months on average. However, we may also seek to profit from shorter or longer-term market trends. On occasion, we will hold securities such that we generate long-term gains or losses. We are not typically driven by a 'tax-advantaged' strategy, which means our focus is not on achieving tax-favored long-term gains. When the market is determined to be in an 'up' trend, we buy ETFs and mutual funds. When we determine the market to be in a 'down' trend, we typically go to cash or buy inverse ETF's or mutual funds. We may use 'enhanced' ETF's or mutual funds to attempt to improve returns or hedge against risk.

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C) We select funds that already outperform the broader market while they are still accelerating in performance, relative to other industry and international sectors, early in their cyclical up-trends. On longer-term market downtrends (e.g. those of more than one quarter) our models will begin building positions in defensive sectors that are showing strong relative performance. Historically defensive sectors have typically been bonds, utilities, real estate, healthcare, and precious metals (i.e. gold).

D) Our investment strategy considers the universe of stock market, real estate, fixed income, commodity mutual funds and ETFs, then builds a portfolio focusing on the best-performing assets classes over time. Our models rotate from the weaker asset classes to those that are gaining strength.

Also, our strategy adjusts asset allocation in recognition of market conditions. When the stock market is healthy and strong, we usually fully invest in the top-performing areas of the equity markets. When the stock market is uncertain and weak, we may shift more to cash and fixed income, even taking a short equity position in bear market periods. We do not typically use bank CDs, municipal securities, individual corporate bonds, commodities-based contracts, or currency-based contracts in our investment strategies. However, we may use ETFs which own these investment vehicles.

E) LPG utilizes various investment monitoring and web-based reporting services. These are not limited to specialized investment letters, research or on-line portfolio monitoring. LPG may also use web-based programs such as Morningstar, Forefield, Redtail and Investigo. Our investing information may come from one or more market signal services. Additionally, we may use information from any number of national, economic and financial publications or websites; including but not limited to The Wall Street Journal, Barron's, Yahoo Finance, and Investor's Business Daily. While LPG strives to achieve success with its investment models, investing in securities involves

risk of loss that clients should be prepared to bear.

Item 9- Disciplinary Information:

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be relevant to your evaluation of LPG or the integrity of LPG's management. We have no information applicable to this item.

Further details regarding LPG and its Registered Investment Advisor Representatives can be found on FINRA's BrokerCheck (www.finra.org/brokercheck) or the IAPD (www.adviserinfo.sec.gov) web sites. The information available on these web sites include representative employment history, registration and licenses, and disciplinary history.

Item 10- Other Financial Industry Activities and Affiliations:

A) LPG is a SEC licensed investment advisor. The principal executive officers and other employees are separately licensed as registered representatives of H. Beck, Inc., a FINRA registered broker dealer. Associated persons of LPG may also be insurance agents or brokers for one or more insurance companies as well as Mortgage Originators. As such, these individuals, in their separate capacities as registered representatives and/or insurance agents or Mortgage Originators, will be able to effect securities transactions, other investment products (i.e. insurance) for clients or loan origination, for which they may receive separate compensation. LPG associates spend less than forty percent of their time doing such business, however potential conflicts of interest do exist. Clients are not under any obligation to engage LPG's Investment Advisor Representatives (IARs) when considering implementation of advisory recommendations. The implementation, of any or all recommendations, is solely at the discretion of the client.

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B) H. Beck, Inc. will retain a portion of the investment advisory fees received by LPG as a charge to the investment advisor (not the client) for the supervisory functions H. Beck, Inc. is required to carry out by FINRA. This fee will not increase either execution or brokerage charges to the client, nor will it increase the fee the client has agreed to pay to LPG, pursuant to the client's Managed Investment Advisory Service Agreement. The advisory services offered by LPG are entirely separate and distinct from the brokerage services offered by H. Beck, Inc., though the registered representatives may also be IARs of LPG.

C) While the IARs of LPG endeavor at all times to put the interest of the clients first, as part of LPG's fiduciary duty, clients should be aware that the receipt of additional compensation may create the potential for a conflict of interest; however, LPG through its supervisory process, will make every effort to prevent this from affecting the judgment of these individuals when making recommendations.

D) Occasionally, IARs of LPG may buy and/or sell the same investments recommended to advisory clients. However, due to the fact that the investments tend to be primarily mutual funds and ETFs, it is our opinion that the advisory client(s) will not be harmed or hurt from such investments by IARs.

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

A) Due to the conflicts of interest inherent in the securities industry, LPG has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. LPG's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and sets forth LPG's practice of supervising the personal securities transactions of supervised persons with access to client information.

Individuals associated with LPG may buy or sell

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securities for their personal accounts identical to or different than those recommended to clients. It is the expressed policy of LPG that no person employed by LPG shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on the investment decisions of advisory clients.

B) Compliance supervision of LPG's Code of Ethics, requires that anyone associated with this advisory practice, with access to advisory recommendations, provide statements of all personal investment accounts and any accounts in which they have a financial interest, including accounts for immediate family and/or household members. All personal securities transactions are included except: bank certificates of deposit, commercial paper, money markets, direct obligations of the United States, bankers acceptance notes, or shares issued by registered open-end investment companies.

LPG requires that each affiliated individual must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. LPG will provide a complete copy of its Code of Ethics to any client upon request to LPG's Compliance Officer-Michael Owen.

Item 12 - Brokerage Practices

A) LPG Investment Supervisory Service brokerage accounts are held by Pershing LLC. as the custodian. All variable annuity contracts managed by LPG and/or its IARs are held directly with the insurance company, with H. Beck, Inc. as the broker-dealer. Fixed annuity contracts should have an IAR as the agent of record on the contract. LPG has endeavored to select a broker-dealer and clearing firm which will provide excellent service for a reasonable and fair fee. The reasonableness of such fees is based on the broker's ability to provide professional services, research and other services which will help LPG's IARs provide investment

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management services to clients. LPG's IARs use a broker-dealer who provides useful research and securities transaction services, even though a lower fee arrangement may be available by a broker-dealer who may offer no research services and minimal securities transaction assistance. Research services may be useful in servicing most of our clients; however, not all research may be useful for every account. Per the disclosure above, the principal executive officers and other employees of LPG are separately licensed as registered representatives of H. Beck, Inc., a FINRA registered broker-dealer. Therefore a conflict of interest exists.

B) The principal executive officers and other employees of LPG may, from time to time, receive 12b-1 distribution fees and sales loads from investment companies in connection with the placement of client funds into mutual funds. While these individuals endeavor at all times to put the interest of the clients first as part of LPG's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations to clients.

C) LPG's IARs are licensed as registered representatives with H. Beck, Inc. Pershing LLC, makes available to LPG, through H. Beck, Inc., products and services that benefit LPG which may not necessarily directly benefit its clients. Some of these products and services do assist LPG in managing and administering client's accounts. These include software and other technologies that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of LPG's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services are used to

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service a substantial number of LPG's accounts. However, while the IARs of LPG endeavor at all times to put the interest of the clients first, as part of LPG's fiduciary duty, clients should be aware that these additional services create a conflict of interest, and may affect the judgment of these individuals when making recommendations.

D) LPG may also receive non-cash consideration from investment companies, insurance companies and other investment product companies. Such benefits may include a higher level of service from these organizations, industry reports, economic forecasts that can be used in the management of client accounts, gifts or meals, and entertainment of a reasonable amount. Some investment companies or insurance companies may provide marketing support to LPG and/or IARs, which may be either monetary or non-monetary in value. While the IARs of LPG endeavor at all times to put the interest of the clients first, as part of LPG's fiduciary duty, clients should be aware that the receipt of additional support and assistance itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Item 13 - Review of Accounts

A) Initially, upon opening an account, each client's investment objective, income, age, employment status, occupation, financial resources, level of sophistication and knowledge about securities markets are obtained and reviewed by LPG's Compliance Officer. While the underlying securities within investment accounts are continually monitored, these accounts are also reviewed annually to ensure consistency with clients' stated financial objectives. Financial planning clients will be reviewed as contracted for at the inception of the advisory relationship.

B) Account reviews can also be triggered by client questions, major life events or changes, or significant changes in account balance, such as

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new deposits or withdrawals.

C) Investment advisory clients will receive periodic account statements, confirmations, and other details inserted/mailed from the broker-dealer/custodian (physically or electronically). LPG may also provide account reports as contracted for at the inception of the advisory relationship. Such reports may include the amount of fee, the value of the client's assets upon which the fee was based, and the manner in which the fee was calculated. LPG urges clients to carefully review such statements and compare such official custodial records to the account statements that LPG may provide. LPG statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Also, LPG may generate reports through various third-party software providers such as Morningstar, Forefield, Redtail, Investigo, etc.

Item 14 - Client Referrals and Other Compensation

LPG does not have any client referral arrangements. We do not pay any outside solicitor fees to refer investors to the firm. However, principal officers and other employees of LPG are separately licensed as registered representatives of H. Beck, Inc., a FINRA registered broker dealer. Associated persons of LPG may also be insurance agents or brokers for one or more insurance companies. As such, these individuals, in their separate capacities as registered representatives and/or insurance agents or brokers, will be able to effect securities transactions or other investment products (i.e. insurance) for clients, for which they may receive separate compensation.

Item 15 - Custody

LPG does NOT have custody of client funds or securities. Clients should receive statements, at least quarterly, from the custodian that holds and maintains client's investment assets. LPG urges you to carefully review such statements and

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compare such official custodial records to the account performance statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 - Investment Discretion

A) LPG usually receives discretionary authority from the client at the outset of an advisory relationship via the Managed Investment Advisory Service Agreement. This agreement allows LPG to select the identity, timing, and amount of securities to be bought or sold. The agreement explains the limitations of the authority and defines the parameters surrounding the investment selection. Clients will select a risk profile and indicate an investment strategy. However, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, LPG observes the investment policies, limitations and restrictions of the clients for which it advises. When trading registered investment companies, LPG's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. Investment guidelines and or restrictions must be provided to LPG in writing.

B) Though every client's portfolio is unique, many of our clients utilize one or more of our investment strategies. Some of these transactions are driven by changes in a given signal or market trend, we recognize the necessity to act quickly and accurately to make appropriate portfolio changes consistent with the new signal or trend. Upon change in a signal, we make every effort to insure that all clients get the best possible price by bunching together similar orders in an effort to achieve price consistency across accounts.

Item 17 - Voting Client Securities

As a matter of firm policy and practice, LPG does not have any authority to and does not vote proxies

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on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. LPG may however provide advice to clients regarding the clients' voting of proxies.

Item 18 - Financial Information

We are not required to file a balance sheet for purposes of this document. We do not have custody of client assets, nor do we require prepayment of more than \$1,200 in fees 6 or more months in advance. We have not been the subject of a bankruptcy petition at any time during the past ten years.

INVESTMENT ADVISOR BROCHURE SUPPLEMENT

**Travis J. Hudak
Michael L. Child
David Wm. James**

Legacy Planning Group, Inc.

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March 2012

This brochure supplement provides information about Travis J. Hudak, Michael L. Child and David Wm. James that supplements the Legacy Planning Group, Inc brochure. Please contact Michael Owen, Compliance Officer, if you did not receive Legacy Planning Group, Inc's brochure or if you have any questions about the contents of this supplement.

Additional information about the above listed individuals is available on the SEC's website at www.adviserinfo.sec.gov

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Educational Background and Business Experience

Form ADV Part 2B, Item 2

TRAVIS J. HUDAK (CRD# 3128251)

Year of Birth 1972

Post-Secondary Education:

University of Utah – 1997, BS, Finance

Recent Business Background:

- Legacy Planning Group, Inc, Investment Advisor Representative, 03/2008 - Present
- H. Beck, Inc., Registered Representative, 04/2008 – Present
- GunnAllen Financial, Registered Representative, 10/2007 – 04/2008
- Investment Management Corporation, Investment Advisor Representative, Financial Advisor, 10/2003 – 12/2007
- Eagle Gate Securities, Financial Advisor, 08/2002 – 10/2003
- UBS Financial Services, Financial Advisor, 09/1999 – 08/2002

MICHAEL L. CHILD (CRD# 3128249)

Year of Birth 1971

Post-Secondary Education:

University of Utah – 1997, BS, Financial

Recent Business Background:

- Legacy Planning Group, Inc, Investment Advisor Representative, 03/2008 - Present
- H. Beck, Inc., Registered Representative, 04/2008 – Present
- GunnAllen Financial, Registered Representative, 10/2007 – 04/2008
- Investment Management Corporation, Investment Advisor Representative, Financial Advisor, 10/2003 – 12/2007
- Eagle Gate Securities, Financial Advisor, 08/2002 – 10/2003
- UBS Financial Services, Financial Advisor, 03/2000 – 08/2002

Educational Background and Business Experience

Form ADV Part 2B, Item 2

DAVID WM. JAMES (CRD#1241412)

Year of Birth 1956

Post-Secondary Education:

Brigham Young University – 1980, BA, Family Resource Management

Recent Business Background:

- Legacy Planning Group, Inc, Investment Advisor Representative, 03/2008 - Present
- H. Beck, Inc., Registered Representative, 04/2008 – Present
- GunnAllen Financial, Registered Representative, 10/2007 – 04/2008
- Investment Management Corporation, Investment Advisor Representative, Financial Advisor, 10/2003 – 12/2007
- Eagle Gate Securities, Financial Advisor, 12/2001 – 10/2003
- UBS Financial Services, Financial Advisor, 06/1996 – 11/2001

Disciplinary Information

Form ADV Part 2B, Item 3

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be relevant to your evaluation of Travis Hudak, Michael Child, or David James. We have no information applicable to this item.

Further details regarding the above individuals can be found on FINRA's BrokerCheck (www.finra.org/brokercheck) or the IAPD (www.adviserinfo.sec.gov) web sites. The information available on these web sites include representative employment history, registration and licenses, and disciplinary history.

Other Business Activities

Form ADV Part 2B, Item 4

The listed individuals are officers and employees of Legacy Planning Group, Inc and are separately licensed as registered representatives of H. Beck, Inc., a FINRA registered broker dealer.

Mr. Hudak, Mr. Child and Mr. James are also insurance agents for one or more insurance companies. As such, these individuals, in their separate capacities as registered representatives and/or insurance agents or brokers, will be able to effect securities transactions or other investment products (i.e. insurance) for clients, for which they may receive separate compensation. Mr. Hudak, Mr. Child and Mr. James are also mortgage originators. The listed individuals spend less than forty percent of their time doing such business.

Thus, a conflict of interest may exist between the interests of Mr. Hudak, Mr. Child and Mr. James and those of the advisory clients. However, clients are under no obligation to act upon the recommendations of the listed individuals or effect any transactions through Mr. Hudak, Mr. Child or Mr. James if they decide to follow the recommendations.

Additional Compensation

Form ADV Part 2B, Item 5

Not applicable.

Supervision

Form ADV Part 2B, Item 6

The compliance officer, Michael Owen, of the firm supervises the professional activities of the other individuals.

Requirements for State-Registered Advisors

Form ADV Part 2B, Item 7

Not applicable