

# **LEGACY FINANCIAL SERVICES GROUP, INC.**

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This brochure provides information about the qualifications and business practices of Legacy Financial Services Group, Inc. If you have any questions about the contents of this brochure, please contact us at: 231-933-0631, or by email at: [info@discoverlegacy.net](mailto:info@discoverlegacy.net). 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 does not imply a certain level of skill or training.

Additional information about Legacy Financial Services Group, Inc. is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Legacy Financial Services Group, Inc. is 140514.

## **Item 3 – Material Changes**

### **Summary of Material Changes**

Set for below is a summary of material changes in this brochure from our last annual update. Our last annual update was dated March 28, 2013.

- Legacy Financial Services Group, Inc. changed from a corporation to a limited liability company.
- Legacy Financial Services Group, Inc. (“Legacy Group”) has entered into written referral agreements with third parties by which the third party may, from time to time, refer clients that may establish accounts and enter into advisory relationships with us. Legacy Group pays the third party a referral fee equal to a percentage of investment advisory fees received by us from the referred client. Cash referral fees shall be paid pursuant to a written agreement to which Legacy Group is a party (copy to be maintained Legacy Group), which will include disclosure of any relationship between the solicitor and Legacy Group, either directly or indirectly.

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#### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 231-933-0631 or by email at: [info@discoverlegacy.net](mailto:info@discoverlegacy.net).

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## Item 4 - Advisory Business

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### Firm Description

This Disclosure document is being offered to you by Legacy Financial Services Group, Inc. ("Legacy Group") in connection with the investment advisory services we provide. It discloses information about the services we provide and the manner in which those services are made available to you, the client.

We are a fee-based investment management firm located in Traverse City, Michigan, specializing in investment advisory services for investors. The firm was established in 2001 and became a registered investment adviser in 2006. Derek Weeks owns the firm.

We are committed to helping clients build, manage, and preserve your wealth and to providing assistance to clients to help achieve their stated financial goals. We may offer an initial complimentary meeting; however, investment advisory services are initiated only after you and Legacy Group execute an engagement letter or client agreement.

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### Investment Management and Supervision Services

Legacy Group provides personalized confidential financial planning and investment management. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Investment advice is an integral part of our investment management. Investment advice is provided, with the client making the final decision on investment selection. A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Most clients choose to have us manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

We offer discretionary investment management and investment supervisory services for a fee based on a percentage of your assets under management. The scope of work and fee for investment management is provided to the client in writing prior to the start of the relationship. A Wealth Management Agreement includes: cash flow management; insurance review; investment management

(including performance reporting); education planning; retirement planning; estate planning; and tax preparation, as well as the implementation of recommendations within each area.

Upon the preliminary review, we determine your portfolio composition based on your needs, portfolio restrictions, if any, financial goals and risk tolerances. Through the initial phases of our relationship, we work with you to obtain necessary information regarding your financial condition, investment objectives, liquidity requirements, risk tolerance, time horizons, and any restrictions on investing. This enables us to determine the portfolio best suited for your investment objective and needs.

In performing our services, we are not required to verify any information received from you or from other professionals. If you request, we may recommend and/or engage the services of other professionals for implementation purposes. You are under no obligation to engage the services of any such recommended professional.

Once we have determined the types of investments to be included in your portfolio, and allocated them, we will provide ongoing portfolio review and management services. This approach requires us to review our portfolios on a frequent basis.

We will rebalance the portfolio, as we deem appropriate, to meet your financial objectives. We will trade these portfolios and rebalance them on a discretionary basis.

While our advisory services are tailored to you as an individual, our multi-fund manager approach makes it difficult for us to ensure that your portfolio will not invest in a particular industry or security. However, we are happy to discuss your preferences regarding socially conscious investment concerns and, we'll try as much as possible, to accommodate them.

In all cases, you have a direct and beneficial interest in your securities, rather than an undivided interest in a pool of securities. We do not and will not have custody of your funds or securities. We have limited authority to direct the Custodian to deduct investment advisory fees, but only with the appropriate authorization from you.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

On more than an occasional basis, we furnish advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning. This advice is included in our Investment Management fee.

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## **Wrap Fee Programs**

We do not place Client assets into a wrap fee program.

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## **Assets**

As of 12/31/2013, we manage \$97.5 Million in assets on a discretionary basis. We do not manage any non-discretionary assets.

## **Item 5 - Fees and Compensation**

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### **Investment Management Fees and Compensation**

Legacy Group charges a fee as compensation for providing Investment Management services to your account. These services include advisory and consulting services, trade entry, investment supervision, and other account maintenance activities. The custodian may charge custodial fees, transaction costs, redemption fees, retirement plan and administrative fees or commissions. See Additional Fees and Expenses below.

The fees for accounts are based on an annual percentage of your assets that we manage. The fees are applied to the account asset value on a pro-rated basis, billed monthly, in arrears. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

The initial fee will be based upon the market value of the account on the date the account is accepted for management by execution of the investment advisory contract by the Firm and the assets are transferred, and then prorated for the number of days in the calendar month that your account is under management.

Thereafter, the fee will be based on the market value of the account on the last day of the previous calendar month and will cover the period from the first day of the calendar month through the last day of the calendar month. The market value will be determined as reported by the Custodian. Fees are assessed on all assets under management, including securities, cash and money market balances. Margin debit balances do not reduce the value of assets under management.

Fees may vary based on the size of the account, complexity of the portfolio, extent of activity in the account or other reasons agreed upon by us and you as the client. Fees will generally follow the schedule of assets under management outlined below. In certain circumstances at our discretion, we may allow you to negotiate fees.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

<u>Annual %</u>	<u>Portfolio Size</u>
2.00%	Up to \$249,000 <i>(if accepted conditionally)</i>
1.75%	\$250,000 - \$499,999
1.50%	\$500,000 - \$999,999
1.00%	\$1,000,000 - \$1,999,999
0.90%	\$2,000,000 - \$2,999,999
0.80%	\$3,000,000 - \$4,999,999
Determined at Engagement	\$5,000,000 +

Current client relationships may exist where the fees are higher or lower than the fee schedule above.

In our discretion, we may add (aggregate) asset amounts in accounts from your same household together to determine the advisory fee for all your accounts. We may do this, for example, where we also service accounts on behalf of your minor children, individual and joint accounts for a spouse, and/or other types of related accounts. This consolidation practice is designed to allow you the benefit of an increased asset total, which could potentially cause your account(s) to be assessed a reduced advisory fee based on the asset levels available in our fee schedule.

You authorize us to debit your account quarterly for our fee. The independent qualified custodian holding your funds and securities will debit your account directly for the advisory fee and pay that fee to us.

You will provide written authorization permitting the fees to be paid directly from your account held by the qualified custodian. Further, the qualified custodian agrees to deliver an account statement at least quarterly directly to you indicating all the amounts deducted from the account including our advisory fees. You are encouraged to review your account statements for accuracy. We will receive a duplicate copy of the custodian's statement that was delivered to you.

Although the Wealth Management Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or Legacy Group may terminate the Agreement by written notice to the other party. At termination, fees will be billed on a pro



pro rata basis for the portion of the month completed. The portfolio value at the completion of the prior full billing month is used as the basis for the fee computation, adjusted for the number of days during the billing month prior to termination. Upon termination, you are responsible for monitoring the securities in your account, and we will have no further obligation to act or advise with respect to those assets.

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**Additional Fees and Expenses:**

Advisory fees payable to us do not include the fees you may pay when we purchase or sell securities for your Account(s). The following list of fees or expenses are what you may pay directly to third parties, whether a security is being purchased, sold or held in your Account(s) under our management.

- Brokerage commissions;
- Transaction fees;
- Exchange fees;
- SEC fees;
- Advisory fees and administrative fees charged by Mutual Funds (MF), and/or Exchange Traded Funds (ETFs)
- Advisory fees charged by sub-advisers (if any are used for your account)
- Custodial Fees;
- Deferred sales charges (on MF or annuities);
- Odd-Lot differentials;
- Transfer taxes;
- Wire transfer and electronic fund processing fees;
- Fees on existing variable annuities that may have been subject to trailing service fees, deferred sales charges, and mortality and expense fees.
- Fees on Mutual fund assets deposited in the account that may have been subject to deferred sales charges and 12 (b)(1) fees and other mutual fund annual expenses as described in the fund's prospectus.

Please refer to the "Brokerage Practices" for discussion of Legacy Group's brokerage practices.

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**Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Legacy Group.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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**Past Due Accounts and Termination of Agreement**

We reserve the right to stop work on any account that is more than 15 days overdue. In addition, we reserve the right to terminate any engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Legacy Group, Inc.'s judgment, to providing proper financial advice. Any unused portion of fees collected will be refunded on a prorated basis.

## **Item 6 - Performance-Based Fees**

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Legacy Group does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

## **Item 7 - Types of Clients**

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**Description**

Legacy Group generally provides investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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**Account Minimums**

The minimum account size is \$250,000.00 of assets under management, which equates to an annual fee of \$3,750.00.

When an account falls below \$250,000 in value, the management fee percentage will remain unchanged. Depending upon circumstances, Legacy Group will negotiate a lower rate.

Legacy Group has the discretion to waive the account minimum. Accounts of less than \$250,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$250,000 within a reasonable time. Other exceptions will apply to employees of Legacy Group and their relatives, or relatives of existing clients.

Clients receiving ongoing asset management services and with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

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

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### **Methods of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Legacy Group may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Investor's Business Daily, TD Ameritrade Institutional, and the World Wide Web.

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### **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation based on each client's timeframe and risk tolerance. Portfolios are diversified in various asset classes which are reviewed and generally are rebalanced on a quarterly basis. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases and trading.

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### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9 - Disciplinary Information**

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### **Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10 - Other Financial Industry Activities and Affiliations**

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### **Affiliations**

Legacy Financial Services Group recommends the services of TD Ameritrade Institutional, and participates in the custodian's investment advisor service program. The decision to utilize this preferred broker/dealer is based upon the customer service provided to investors and the services available to the Advisor. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent

investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions.

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**Insurance**

In addition, as a convenience to our, certain IAR's of Legacy Group are also licensed insurance agents and sell various life insurance products, long term care and annuities. As a result, our IAR's may receive compensation for these activities as an insurance agent. A limited portion of the time they spend (generally less than 10%) is in connection with these activities and it represents less than 10% of our ongoing revenue. Clients are not under any obligation to purchase insurance products.

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

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**Code of Ethics**

The employees of Legacy Group have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Participation or Interest in Client Transactions**

Legacy Group and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Legacy Group *Compliance Manual*.

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**Personal Trading**

The Chief Compliance Officer of Legacy Group is Carolyn Weeks. She reviews all employee trades each quarter. Her trades are reviewed by Jen Burrows. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## **Item 12 - Brokerage Practices**

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**Selecting Brokerage Firms**

Legacy Group does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. Legacy Group recommends custodians based on the proven

integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Legacy Group recommends discount brokerage firms and trust companies (qualified custodians), such as TD Ameritrade. Legacy Group is an advisor with TD Ameritrade.

Legacy Group does not receive fees or commissions from any of these arrangements.

Advisor participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware,

however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

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**Best Execution**

Legacy Group reviews the execution of trades at each custodian each quarter. The review is documented in the Legacy Group *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. Legacy Group does not receive any portion of the trading fees.

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**Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## Item 13 - Review of Accounts

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**Periodic Reviews**

Account reviews are performed quarterly by Derek Weeks, President and Kelly Kazmierski, Advisor. Account reviews are performed more frequently when market conditions dictate.

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**Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

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**Regular Reports**

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. Wealth Management clients receive written quarterly updates. The written updates may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

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**Net Worth Statements**

Clients are frequently provided net worth statements and net worth graphs that are generated from our client relationship management system. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

## Item 14 - Client Referrals and Other Compensation

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### Incoming Referrals

Legacy Group may enter into written referral agreements with third parties by which the third party may, from time to time, refer clients that may establish accounts and enter into advisory relationships with us. This practice may present a conflict of interest and the firm does the following to mitigate the conflicts.

Legacy Group pays the third party a referral fee equal to a percentage of investment advisory fees received by us from the referred client. Cash referral fees shall be paid pursuant to a written agreement to which Legacy Group is a party (copy to be maintained Legacy Group), which will include disclosure of any relationship between the solicitor and Legacy Group, either directly or indirectly. The referral fee may be split between third parties who have jointly participated in referring a client to Legacy Group. The fee to be paid by Legacy Group will be borne entirely by us and there will be no additional fee, cost or expense to the referred client resulting from the referral agreement.

Legacy Group makes disclosure of such referral arrangement to the client before entering into an advisory agreement. The solicitor will provide a copy of the Form ADV Part 2A (Brochure) and a copy of the Solicitor Disclosure Document to you at the time of solicitation. A copy of such disclosure document and Client receipt acknowledgement shall be retained as a part of our records. The solicitor shall be required to execute an affirmative that he/she is not subject to any order, or SEC proceeding/order as described in Section 203(3) of the Act. The solicitor is not permitted to offer Clients any investment advice on behalf of Legacy Group. All referral agreements are governed by Rule 206(4)-3 under the Investment Advisers Act of 1940.

Legacy Group has established a Solicitor arrangement with Honor Bank. This relationship creates compliance issues relative to consumer protection. The joint guidelines of regulators of the depository institution call for at a minimum both written and verbal disclosure at and prior to the time securities products are purchased or sold that such securities products:

1. Are not insured by the Federal Deposit Insurance Corporation (FDIC) or any other federal or state deposit guarantee fund or other government agency;
2. Not endorsed or guaranteed by the bank or their affiliates;
3. Are not deposits or obligations of the depository institutions and are not guaranteed by the depository institutions



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**Referrals Out**

Legacy Group does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Item 15 - Custody**

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Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

Legacy Group is deemed to have custody of client funds and securities whenever Legacy Group is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Legacy Group will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Legacy Group is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. When clients have questions about their account statements, they should contact Legacy Group or the qualified custodian preparing the statement.

When fees are deducted from an account, Legacy Group is responsible for calculating the fee and delivering instructions to the custodian.

**Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Legacy Group .

## **Item 16 - Investment Discretion**

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**Discretionary Authority for Trading**

Legacy Group accepts discretionary authority to manage securities accounts on behalf of clients. Legacy Group has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the

amount of the securities to be bought or sold. However, Legacy Group consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. Legacy Group does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

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**Limited Power of Attorney**

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## **Item 17 - Voting Client Securities**

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**Proxy Votes**

Legacy Group does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Legacy Group will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## **Item 18 - Financial Information**

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**Financial Condition**

Legacy Group does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Legacy Group does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

## **Business Continuity Plan**

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**General**

Legacy Group has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

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**Disasters**

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

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**Alternate Offices**

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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**Loss of Key Personnel**

Legacy Group has a Business Continuation Plan in place in the event of Derek Weeks' serious disability or death.

## **Information Security Program**

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**Information Security**

Legacy Group maintains an information security program to reduce the risk that your personal and confidential information may be breached.

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**Privacy Notice**

Legacy Group is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated

third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

**Derek E. Weeks**

**Kelly Kazmierski**

**LEGACY FINANCIAL SERVICES GROUP, INC.**

**10691 E. Carter Rd. Suite 101  
Traverse City, MI 49684**

**231-933-0631**

**231-933-0838**

March 17, 2014

The Brochure Supplement provides information about Derek Weeks and Kelly Kazmierski that supplements the Legacy Financial Services Group, Inc. Brochure. You should have received a copy of the Brochure. Please contact Carolyn Weeks, Chief Compliance Officer if you did not receive Legacy Financial Services Group, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Derek Weeks and Kelly Kazmierski is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**Derek E. Weeks, President**

- Date of Birth: January 10, 1969

**Educational Background:**

- FINRA Series 6, 26 and 63 (*inactive in fee-based advisory firm*)
- Licenses: Michigan Life and Health Licenses (and licensed in appropriate jurisdictions)

**Business Experience:**

- **Legacy Financial Services Group, Traverse City, MI**, President  
Registered Investment Advisor: (2006 – Present)  
Pre-RIA registration: (2001 – 2006) (insurance services)
- **Linsco/Private Ledger, Traverse City, MI**, Registered Representative and Advisory Representative  
Broker/Dealer and Investment Advisor: (2002 – 2006)
- **NY Life Securities, Inc., Okemos, MI**, Registered Representative  
Broker/Dealer: (1998 – 2001)
- **Metropolitan Life Insurance Company, Williamsburg, MI**, Life Insurance Representative: (1994 – 1998)

**Other Business Activities:**

Mr. Weeks is an insurance agent. In such capacity, he may offer fixed and variable life insurance products and receive normal and customary commissions as a result of any purchases made by clients. The client is under no obligation to purchase fixed or variable life insurance through Mr. Weeks on a commissionable basis. In addition, Mr. Weeks may receive other compensation such as fixed or variable life trails. The potential for receipt of commissions and other compensation gives him an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. To address this, disclosure is made to the client at the time purchase is made, identifying the nature of the transaction or relationship, the role to be played and any compensation (e.g., commissions, trails) to be paid by the client and/or received by the insurance agent.

**Additional Compensation:**

None

Supervision:

Derek E. Weeks is supervised by Carolyn Weeks, Chief Compliance Office. She reviews Derek Weeks' work through frequent office interactions as well as remote interactions. She also reviews Derek Weeks' activities through our client relationship management system.

SUPERVISOR'S contact information:

231-933-0631 cweeks@discoverlegacy.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

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**Kelly Kazmierski, Financial Advisor**

- Date of birth: December 25, 1972

Educational Background:

- FINRA: Series 65
- FINRA: Series 6 and 63 (inactive in fee-based advisory firm)
- Licenses: Michigan Life and Health Licenses (and appropriate jurisdictions)
- Michigan State University, East Lansing B.A (1995)

Business Experience:

- **Legacy Financial Services Group, Traverse City, MI**, Registered Investment Advisor: (2004 – Present)  
Pre-RIA registration: (2001 – 2006) (insurance services)
- **Linsco/Private Ledger, Traverse City, MI**, Registered Representative and Advisory Representative  
Broker/Dealer and Investment Advisor: (2004 – 2006)
- **Huntington Bankshares, Traverse City, MI**, Trust Officer Banking: (2002 – 2004)
- **Grand Traverse Area Catholic Schools, Traverse City, MI**, Director School System: (1997 – 2002)
- **PVC Geomembrane Institute, Traverse City, MI**, Executive Director Marketing: (1995 – 2007)

Other Business Activities:

Ms. Kamierski is an insurance agent. In such capacity, she may offer fixed and variable life insurance products and receive normal and customary commissions as a result of any purchases made by clients. The client is under no obligation to purchase fixed or variable life insurance through Ms Kamierski on a commissionable basis. In addition, Ms. Kamierski may

receive other compensation such as fixed or variable life trails. The potential for receipt of commissions and other compensation gives her an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. To address this, disclosure is made to the client at the time purchase is made, indentifying the nature of the transaction or relationship, the role to be played and any compensation (e.g., commissions, trails) to be paid by the client and/or received by the insurance agent.

Additional Compensation:

None

Supervision:

Kelly Kazmierski is supervised by Derek Weeks, President. He reviews Kelly Kazmierski's work through frequent office interactions as well as remote interactions. He also reviews Kelly's Kazmierski's activities through our client relationship management system.

SUPERVISOR'S contact information:

231-933-0631 dweeks@discoverlegacy.net

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None