

Firm Brochure

(Part 2A of Form ADV)

The Company Investment Management, Inc.

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CRD# 151471

This brochure provides information about the qualifications and business practices of EmergingWealth Investment Management, Inc. If you have any questions about the contents of this brochure, please contact us at: (866) 280-4896. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about EmergingWealth Investment Management, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

DATE:

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Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes Since The Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisors to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

8/28/2014 Updating Vince Strangio with PPCTM designation

11/23/2014 Removed Eric DeMico

11/23/2014 Added the definition of CFA[®] Designation and Requirements

12/04/2014 Updated Folio Institutional Fee Schedule

1/27/2015 Added Senior Investment Analyst (CFA[®]) Fee

1/27/2015 Added Investment Research Analyst Fee

1/27/2015 Removed payment by Money Order

3/04/2015 Added CFP[®] Designation to Bradley M. Pendzick

Full Brochure Available

Whenever you would like to receive a complete copy of EmergingWealth Investment Management, Inc.’s Firm Brochure, please contact them by telephone at: (866) 280-4896.

Advisory Business

Firm Description

EmergingWealth Investment Management, Inc. ("The Company") is a Fee-Only U.S. Securities Exchange Commission registered investment advisory firm located in Pittsburgh, Pennsylvania. The Company was founded in July, 2009.

Advice is provided through consultation with the client and may include, but is not limited to: determination of financial objectives; identification of financial problems, cash flow consulting; investment management and/or consulting.

Principal Owners

Louis P. Stanasolovich is a 92.0% stockholder. The remaining 8.0% of ownership collectively is owned by three (3) other employees.

Types of Advisory Services

Discretionary Investment Management

The Company provides ongoing advice to a client regarding investment of client funds based on the individual needs of the client. Through discussions in which the client's goals and objectives are established, The Company will develop a client's personal Investment Policy Statement and create and manage a portfolio based on that policy. Portfolio supervision is guided by the stated objectives of the client.

The Company has engaged Legend Financial Advisors, Inc.[®] (hereafter "Legend" or the "Subadvisor"), a registered investment advisor related to The Company through common ownership and control, to directly manage all client portfolio assets as Subadvisor. All investment professionals of The Company are also associated persons of Legend.

The Company and/or the Subadvisor will manage securities portfolios on an ongoing basis. The investment decisions for each client's portfolio(s) are made on the basis of that client's needs as indicated by their completed Risk Tolerance Questionnaire(s). Most portfolios can include open-end and closed-end mutual funds and Exchange-Traded products, but some portfolios may also include individual securities such as stocks and other types of investments unless the client has otherwise restricted their usage in writing. Investment securities will be selected on the basis of any or all of the following criteria: the investment's performance history; the industry sector; country and/or region it is located in; the track record of the investment;

valuation of the investment or asset class as may be applicable; the investment's management style and philosophy; and the investment's management fee structure.

Weightings within a portfolio of investment positions, sectors, types of securities, etc. will be determined by each client's individual financial goals, risk tolerance, as well as the type of portfolio the client selects. Clients will retain individual ownership of all investments. Investment portfolios are managed on a discretionary basis only.

Margin transactions, although not used for investment purposes, can be used when requested by clients to access cash from their account.

Client Imposed Restrictions

The goals and objectives for each client generally are discussed in conversations prior to the implementation of their investment portfolio. Clients may impose restrictions on investing in certain securities or types of securities. The client will be asked to notify The Company in writing, in advance of any restrictions with regard to their investment portfolios.

Wrap Fee Programs

The Company does not participate in any wrap fee programs.

Client Assets

As of December 31, 2014, The Company manages approximately \$7,133,708.00 in assets for approximately fourteen (14) clients. The Company does not manage investments on a non-discretionary basis. All of the assets are managed only on a discretionary basis.

Fees and Compensation

Compensation Description/Fee Billing

The Company receives fees from only their clients. This is known as a Fee-Only compensation structure as opposed to a Fee and Commission compensation structure, also known as Fee-Based or a Commission-Only compensation structure. Generally, fees are not negotiable.

The Company, in their sole discretion, may waive their minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity,

anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

The Company may discount the listed advisory fees up to 30.00% to law, insurance, accounting and other types of financial advisory firms and to the persons associated with those firms. This discount is provided in the hope that these firms and their associated individuals may recommend The Company to their clients who need investment advisory services. However, no firm or individual who receives the discount is obligated in any way to recommend The Company to any person. There is no direct compensation paid to these firms or individuals for referring prospective clients to The Company. The Company may also offer up to a 30.00% discount to non-profit organizations.

Discretionary Investment Management (For Clients Who Custody at Pershing and Shareholders Service Group)

The quarterly fee (all portfolios will be billed separately on a fiscal quarter basis) for Discretionary Investment Management Services will be charged as a percentage of assets under management, according to the following schedule:

- a. .2500% on the first \$500,000.00;
- b. .1875% on the amount in excess of \$500,000.00 but not greater than \$2,000,000.00;
- c. .1250% on the amount in excess of \$2,000,000.00, but not greater than \$5,000,000.00
- d. .0625% on the amount in excess of \$5,000,000.00.

A minimum securities portfolio value of \$250,000.00 is generally required for Discretionary Investment Management Services subject to an overall quarterly minimum fee.

The total minimum quarterly fee is \$750.00. This minimum fee may prevent The Company from providing services to small portfolios.

The client authorizes the custodian to deduct from any of the client's account(s) to pay The Company all fees due. The client also authorizes The Company, under its discretionary authority, to liquidate positions in their portfolio and/or accounts in order to provide sufficient funds for fee

payment. The Company, in special circumstances, may elect to bill the client directly.

A client may terminate their relationship at any time and receive a prorata refund of any unearned fee, if fees are paid in advance, if applicable. Similarly, any earned, unpaid fees will be due and payable upon termination.

In addition, The Company may terminate their relationship at any time and will refund any unearned fees as determined on a prorata basis, if applicable. Similarly, any earned, unpaid fees will be due and payable upon termination.

Fee Schedule (For Clients Who Custody at Folio Institutional (Folio))

The Company's calendar quarter fee schedule is billed separately on each account held at Folio under a different billing schedule as offered by The Company when establishing accounts on behalf of the client at Folio. The Company's lower fee schedule is offered as a result of negotiation with Folio due to the calendar quarter fee scheduled charged by Folio for services offered by them. Should the fee schedule charged by Folio to the client decrease, The Company will increase its fee schedule by a corresponding amount. The Company's calendar quarter fee schedule for assets that are custodied at Folio only is shown below:

- a. 0.2000% on the first \$500,000.00;
- b. 0.1675% on the amount in excess of \$500,000.00, but not greater than \$2,000,000.00;
- c. 0.1125% on the amount in excess of \$2,000,000.00.

Folio has its own calendar quarter fee schedule which has no relation to the The Company's fee schedule. See the Folio fee schedule for further information.

The client also authorizes The Company, under its discretionary authority, to liquidate positions in the portfolio in order to provide sufficient funds for fee payment. The Company, in special circumstances, may elect to bill the client directly.

Folio's custodial services are only used for Discretionary Investment Management Services.

A client may terminate their relationship at any time and receive a prorata refund of any unearned fee, if fees are paid to The Company in advance, if applicable. Similarly, any earned, unpaid fees that are owed to The Company will be due and payable upon termination.

In addition, The Company may terminate their relationship at any time and will refund any unearned fees charged by The Company as determined on a prorata basis, if applicable. Similarly, any unpaid fees earned by The Company, will be due and payable upon termination.

Past Due Accounts

The Company currently charges a 1.00% monthly late fee on any advisory fee balances that are thirty (30) calendar days overdue, subject to a minimum late fee of \$50.00 per thirty (30) calendar day period. An additional 1.00% late fee, subject to the minimum described above, will be charged to the client on the remaining outstanding balances each thirty (30) calendar day period thereafter until the balance is paid in full. Please note that the late fee percentage rate and the minimum late fee are subject to change.

Other Fees Or Expenses

All fees paid for investment advisory services are separate and distinct from the fees and expenses charged by investment securities including, but not limited to; mutual funds, Exchange-Traded products, limited partnership units, managed futures, REITs, etc. These fees from these entities will include, but are not limited to; a management fee, other fund expenses, and a possible distribution fee.

In addition to the advisory fees, clients are also responsible for the fees and expenses charged by custodians and broker-dealers. Such fees may include, but are not limited to; any transaction charges, fees for duplicate and/or paper quarterly or monthly statements as well as electronic and/or paper transaction confirmation statements, and fees for electronic data feeds and reports. Termination fees may also apply to the liquidation and/or transfer of any account including, but not limited to, retirement and non-retirement accounts.

In certain circumstances, electronic delivery may not be available.

If a client does not have the ability to receive documents or communicate in an electronic form, The Company may agree to waive this requirement. However, The Company will impose an in-advance, non-refundable, annual processing fee of \$480.00 for non-electronic delivery of documents and/or performance reports. That fee will be billed on the annual contract date.

The Company may impose a transaction fee on any transaction or service performed for a client's non-managed account (Ex. Trade of security).

The Company may impose a fee for providing maintenance to a non-managed account held at one or more custodians that it utilizes.

Fees Paid In Advance

Investment Management fees are not paid in advance.

Termination of Agreement

All agreements will continue in effect until terminated by either party by written notice to the other. Electronic communications will not suffice except facsimile transmission (with a hard copy provided to The Company). All parties of any of The Company's agreements must sign the Termination Schedule (Schedule T) that The Company will provide upon either party's desire to terminate the relationship. Termination of an agreement will not affect the client's obligation to pay advisory fees (prorated through the date of termination).

A client may close his/her/its account at any time and receive a refund of any unearned fee, if applicable. Similarly, any earned, unpaid fee will be due and payable upon termination.

Investment transactions will only be effected up to and including the date of termination. Upon client notification of termination and until the date of termination, The Company and/or the Subadvisor will only execute investment transactions based on written instructions provided by the client. Electronic communications will not suffice except facsimile transmissions (with a hard copy provided to The Company).

Securities/Investment Products Compensation

The Company does not accept compensation for securities or other investment products.

Not Affiliated/Agent

Clients have the option to purchase investment products that The Company recommends through other broker-dealers or agents. However, The Company reserves the right to terminate its contract with the client if the custodian that the client chooses does not offer services competitive of The Company's preferred custodians.

Conflict Of Interest

The Company receives, at no cost, research products and services from mutual fund companies. The fund companies provide these products and services to advisory firms and/or advisors in the hope that they may recommend their funds to advisory clients. The Company has no obligation to these mutual fund companies to recommend these funds. The Company will only recommend these funds (or any funds) when consistent with our fiduciary duty to the client.

Commissions And Other Sales Compensation

The Company does not sell any commissioned products. The Company is not affiliated with entities and/or individuals that sell financial products, securities and/or services for commissions. In addition, finder's fees are not accepted.

Other Advisory Fees

Subadvisor Fee

The Company has engaged Legend to directly manage all of their clients' portfolios as the Subadvisor. The Company will compensate the Subadvisor up to 0.50% of the Investment Management fees for its role as Subadvisor. There are no referral fee arrangements between the two entities.

Staff Time

The Company charges the following fees for staff time:

Wealth Advisor:	\$300.00 per hour
Senior Assistant Wealth Advisor:	\$150.00 per hour
Senior Investment Analyst (CFA®):	\$150.00 per hour
Assistant Investment Analyst	\$100.00 per hour
Assistant Wealth Advisor:	\$100.00 per hour
Investment Coordinator:	\$100.00 per hour
Administrative:	\$75.00 per hour
Clerical:	\$25.00 per hour

A client may terminate their relationship at any time. Any earned, unpaid fees will be due and payable upon termination.

In addition, The Company may terminate their relationship at any time. Any earned, unpaid fees will be due and payable upon termination.

Performance-Based Fees And Side-By-Side Management

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

The Company does not use a performance-based fee structure.

Types of Clients

Description

The Company provides investment management services to individuals, trusts, estates, non-profit organizations and businesses.

Client relationships vary in scope and length of service.

Portfolio Minimums

A minimum security portfolio value of \$250,000.00 is generally required for Discretionary Investment Management Services. However, The Company does require minimum fees per client relationship as stated elsewhere in this document and therefore, a client may have multiple portfolios to fulfill that client relationship minimum fee.

The Company has the discretion to waive the portfolio minimum (value of \$250,000.00 if it deems appropriate, for example, children of clients) as the situation presents itself. Other exceptions will apply to employees of The Company and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis/Investment Strategy

The Company has entered into a written subadvisory agreement with Legend, a registered investment advisor affiliated with The Company through common ownership and control, to provide Investment Management Services to The Company client portfolio(s). As such, and pursuant to the terms of the written subadvisory agreement, Legend will utilize the "Methods Of Analysis" and "Investment Strategies" indicated on Legend's Firm Brochure Form ADV, Part 2A in managing The Company client portfolio(s).

Risk of Loss

The Company and/or the Subadvisor does not guarantee the future performance of the client's investment assets or any specific level of

performance, the success of any investment decision or strategy that may be used, or the success of The Company's and/or the Subadvisor's overall management of the client's investment assets. The client understands that decisions made to use investment assets on behalf of the client are subject to various risks including, but not limited to:

1. **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.
2. **Financial 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.
3. **Inflation or Deflation Risk:** When any type of inflation is present, a Dollar today will not buy as much as a Dollar in the future, because purchasing power is eroding at the rate of inflation. Deflation has the opposite effect.
4. **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.
5. **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.
6. **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 regardless of the economic environment.
7. **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.
8. **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.

9. Political Risk: Government policy may adversely affect securities prices. While domestic policy may have an impact on domestic securities, the risk is more pronounced for international investing. International investing involves additional risks including, but not limited to, currency fluctuations, political or economic conditions affecting the foreign country and differences in accounting standards and foreign regulations.

Disciplinary Information

Criminal Or Civil Action

The Company and its employees have not been involved in any criminal or civil action events related to past or present investment clients.

Administrative Proceeding Before The SEC Or Any Other Regulatory Agencies

The Company and its employees have not been involved in any administrative proceeding before the SEC or any other regulatory agency events related to past or present investment clients.

Self-Regulatory Organization Violations

The Company and its employees have not been involved in any Self-Regulatory Organization (SRO) violations events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliations

The Company and its employees are not registered nor have an application pending to register as a broker-dealer. The Company and its employees are not registered nor do they have an application to register as a future commissions merchant, commodity pool operator, commodity trade advisor or an associated person of the foregoing entities.

Other Affiliations

The Company and its employees do not have other affiliations.

Related Persons

The Company does not have any relationship or arrangement that is material to the business or to the clients with any related persons.

Other Investment Advisors

The Company obtains subadvisory services from its affiliated SEC registered investment advisor, Legend Financial Advisors, Inc.[®], (SEC File No. 801-44704). Both firms, The Company and Legend, have overlapping and/or common ownership, share office space and employees.

Legend Financial Advisors, Inc.[®] (SEC registered investment adviser, file number 801-44704) and The Company Investment Management, Inc. (SEC registered investment adviser, file number 801-70731) have overlapping and/or common ownership with Legend. They share common research, employees and office space. Wealth Advisor Publishing, Inc. shares office space with Legend and The Company. Legend's employees contribute services to Wealth Advisor Publishing, Inc. Wealth Advisor Publishing, Inc. is 100.0% owned by the majority owner of Legend and The Company.

The staff performs services relating to the investment management business and are compensated under the terms of agreements directly or indirectly with Legend.

Wealth Advisor Publishing, Inc. provides educational information to Registered Investment Advisors, Broker/Dealers, and other types of financial professionals about investing and financial planning subjects. The staff of The Company performs services relating to the educational offerings of Wealth Advisor Publishing, Inc. The Company is reimbursed for the use of its staff members.

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

Code of Ethics

The Company has adopted a Code of Ethics which sets forth high ethical standards of business conduct that The Company requires of its employees, including compliance with applicable federal securities laws. The Company's Code of Ethics also includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by The Company's employees. Among other things, the Code of Ethics also requires the prior approval of any

acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. The Code of Ethics also includes oversight, enforcement and recordkeeping provisions. A copy of the Code of Ethics is offered annually to The Company's advisory clients or prospective clients or a copy can be furnished upon request.

Participation or Interest in Client Transactions

The Company and its employees do not recommend, buy, or sell securities in clients' accounts in which The Company or its employees have a material financial interest.

Personal Trading

The Company's policy allows employees to maintain personal securities accounts provided any personal investing by an employee in any accounts in which the employee has a beneficial interest, including any accounts for any immediate family or household members, is consistent with The Company's fiduciary duty to their clients and consistent with regulatory requirements. Each employee must identify any personal investment accounts and report all transactions and investment activity on a quarterly basis to the Chief Compliance Officer or his designee.

The Chief Compliance Officer or his designee reviews all employee trades each quarter. The Chief Compliance Officer's trades are reviewed by the designee or another member of the Investment Committee. The personal trading reviews ensure that the personal trading of employees does not affect the market for that security, and that clients of the firm receive preferential treatment. Since most employee trades are open-end mutual funds, the trades do not affect the securities markets for a particular open-end mutual fund. No personal securities trade is allowed if the security is during an The Company and/or Subadvisor blackout period.

If trading Exchange-Traded Funds, Exchange-Traded Notes or individual securities, those trades can effect the securities market. In this case, client trades will be given preferential treatment.

The Company may maintain a corporate securities account(s). The trading reviews are performed by the Chief Compliance Officer to ensure corporate trading does not affect the market and to ensure that clients receive preferential treatment. However, Legend reserves the right to terminate its contract with the client if the custodian that the client chooses does not offer services competitive of Legend's preferred custodians.

Brokerage Practices

Selecting Brokerage Firms

All investment management and, investment consulting are free to select any broker-dealer of his or her choice.

For investment management and investment consulting clients in need of brokerage or custodial services, and depending on client circumstances and needs, The Company may recommend the use of including, but not limited to; Pershing, Folio Institutional, Shareholders Service Group and Pershing, all are FINRA member broker-dealers unaffiliated with The Company and/or its Subadvisor. The recommendation of these firms is consistent with their fiduciary duty to the client.

Clients should evaluate these broker-dealers before opening an account. The factors considered by The Company when making this recommendation are the broker's ability to provide professional services, our experience with the broker-dealer, reputation, and quality of execution services and costs of such services, among other factors.

Clients are not under any obligation to effect trades through any recommended broker.

The Company does not receive fees or commissions from any of these arrangements.

The Company reserves the right to decline acceptance of any client account for which the client directs the use of a broker-dealer other than Folio Institutional, Shareholders Service Group or a custodian other than Pershing, Folio Institutional, if The Company believes that this choice would hinder its fiduciary duty to the client and/or its ability to service the account. In directing the use of Folio Institutional, Shareholders Service Group and Pershing it should be understood that neither The Company nor the Subadvisor, will have the authority to negotiate fees on a trade-by-trade basis or to necessarily obtain volume discounts and best execution may not be achieved. In addition, a disparity in fees may exist between the fees charged to the client and those charged to other clients of The Company and/or the Subadvisor. Clients should note, while The Company has a reasonable belief that Shareholders Service Group and Folio Institutional are able to obtain best execution and competitive prices, neither The Company nor the Subadvisor, will independently seek best execution price capability through other broker-dealers.

Research And Other Soft Dollars

The Company does not receive research or other products or services from a broker-dealer third party in connection with client securities transactions.

Brokerage For Client Referrals

All investment management or investment consulting clients are free to select any broker-dealer of his or her choice. However, The Company reserves the right to terminate its contract with the client if the custodian that the client chooses does not offer services competitive of The Company's preferred custodians. The Company does not receive referrals of potential clients from any Broker/Dealer or Custodian and therefore does not have an incentive to recommend a broker-dealer based on client referrals.

Directed Brokerage

The Company strongly discourages a client to engage in Direct Brokerage. By using Directed Brokerage, The Company may not be able to achieve the most favorable execution and this practice may cost clients more money.

Order Aggregation

Clients should note that while The Company has a reasonable belief that any broker-dealer engaged by the Subadvisor is able to aggregate the purchase or sale of securities for various client accounts, The Company cannot guarantee this practice.

Trade Error Disclosure

Folio Institutional: The Company is to send a letter of identity to the trade desk advising of the trade error. The trade will be reversed and the client will be made whole. When the reversal settles, the loss or gain is posted to The Company's Sundry account. At that point, The Company covers any loss and pays the client the gain.

Shareholders Service Group: The Company is to contact the trade desk of the trade error. At that point, the client is made whole at the date of the trading error. The security is sold off through Shareholders Service Group's error account. If there is a loss, the loss is posted in The Company's Sundry account to pay for the loss. If the correction results in a gain, that gain is taken by Shareholders Service Group to pay for administrative cost.

Review of Account

Periodic Reviews

Investment Management: An initial review of the portfolio is made and recommendations are provided to the client. Thereafter, reviews of the portfolio(s) are conducted at least quarterly. Reviewers are the members of our Investment Committee of the Subadvisory firm.

Review Triggers

Portfolios are reviewed at The Company's discretion depending upon but not limited to; client circumstances, cash inflows and outflows, and political and economic conditions as well as investment and financial market conditions and movements. Portfolio reviews are also triggered by technical indicators, interest rate fluctuations, tax circumstances, and client upon request.

Regular Reports

Investment Management: In addition to the monthly statements and confirmations of transactions a client receives from their custodian, The Company will provide periodic performance reports, unless assets are held at Folio Institutional (Folio offers reports electronically on their Website.), on quarterly basis to clients with at least \$250,000.00 under management and semi-annual basis to clients with \$100,000.00 - \$250,000.00 under management unless otherwise determined.

Client Referrals and Other Compensation

Client Referrals To The Company

The Company does not accept compensation or economic benefit from anyone providing investment advice or advisory services to the client.

The Company does not directly or indirectly compensate any person for client referrals. However, its affiliated SEC registered investment advisor, Legend Financial Advisors, Inc.[®] (SEC File No. 801-44704) does maintain such arrangements (i.e. soft dollar, additional compensation, compensates for client referrals, etc.).

Solicitor Referrals

The solicitor's sole responsibility is to introduce clients to The Company. The Company will render all investment advisory services to the client.

The solicitor shall be compensated for these services in the following manner:

For all services, 20.00% of the gross advisory fees received from the client, will be paid by The Company within sixty (60) days after the end of the billing quarter to the solicitor.

No payment will be made without delivery to The Company of a signed and dated acknowledgment of receipt of the Solicitor's Firm Brochure, and the The Company's Firm Brochure.

The solicitor agrees to perform these duties in a manner consistent with The Company's instructions, the Investment Advisors Act of 1940 and rules thereunder and applicable state law.

The Company will make a bonafide effort to ascertain that the solicitor has complied with this agreement.

The advisory fee you pay The Company will be no different than the fee you would have been charged had you contracted The Company yourself, or had you been contracted by The Company directly.

Referrals To Other Professionals

The Company does not accept referral fees or any form of compensation from other professionals when its advisors refer a prospect or client to those other professionals.

Other Compensation

The Company does not accept any other form of compensation.

Custody

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record or electronically at least quarterly. Upon receipt of statements directly from the custodian, the client is responsible for careful review on said documents for errors.

Investment Discretion

Discretionary Authority for Trading

The client delegates all discretionary authority for trading and all of its powers with regard to the investment assets to The Company and/or the Subadvisor. The client appoints The Company and/or the Subadvisor as their "attorney and agent in fact" with full authority to buy, sell, or otherwise effect investment transactions on such investment assets on their behalf.

Voting Client Securities

The Company **will not vote** proxies for investments held in the client's accounts. The client will receive proxies and other solicitations directly from the custodian or transfer agent. The client may contact The Company with questions about a particular solicitation.

Financial Information

Prepayment Of Fees

The Company does not require prepayment of fees.

Bankruptcy

The Company has not been the subject of a bankruptcy petition.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

The Company requires that persons in an advisory function within the firm possess, minimally, the following qualifications: College level of education or corresponding years of service and experience in the financial industries in conjunction with continuous peer review and updating to maintain the quality of recommendation, advice, and services. In addition, persons in an advisory function within the firm must receive either the Certified Financial Planner (CFP®) designation or the Chartered Financial Analyst (CFA) designation within eight years of beginning to provide advice on The Company's behalf. Regardless of the designation obtained, it must be kept current with the minimum Certified Education Units (CEU).

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP®): Certified Financial Planners are licensed by the CFP® Board to use the CFP® mark. CFP® certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP® Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA®): Chartered Financial Analysts are licensed by the CFA® Institute to use the CFA® mark. CFA® certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA® Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA® Institute.

Certified Public Accountant (CPA®): Certified Public Accountant is the statutory title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA®. The designation "CPA® Inactive" or an equivalent phrase is permitted in many states. These individuals have previously met the requirements but in the meantime have lapsed their continuing professional education.

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.

- Successful completion of the Uniform Certified Public Accountant Examination.

Professional Plan Consultant (PPCTM): The Professional Plan Consultant (PPCTM) designation signifies a commitment to education and service excellence in the qualified plan industry. The 401(k) Service Training ProgramTM is the only course that sets service standards in the retirement plan industry and imparts professionals not only with the knowledge, but the tools needed to meet (and exceed) those standards.

- A successful candidate must have three years of financial industry sales, service, and/or support experience.
- Successful completion of the 401(k) Service Training ProgramTM. Each candidate must sit for a 50-question, multiple choice examination held at the end of the training program, and obtain a passing score of 70% or better.
- A PPCTM candidate must attend either the instructor-led, multiple-day training session accredited by Robert Morris University or complete the online training program to gain a comprehensive understanding of the issues faced by plan sponsors, how to identify shortfalls in an employer-sponsored plan, and how to successfully address plan management issues.
- On an ongoing basis, over a 24-month cycle, each PPCTM designee must complete a minimum number of continuing education hours (12) in a format allowed by Financial Support Solutions.

Certified Divorce Financial Analyst (CDFATM): In order to be considered for the Certified Divorce Financial Analyst this designation, a professional must have at least two years experience in the financial or legal industry.

- To obtain this designation, a professional must complete a series of four examinations based upon material learned from four self-study courses.
- Coursework outlines several key areas important in divorce proceedings; including the treatment of property during divorce, alimony and child support, and tax implications of property division.
- The entire program generally takes at least four (4) months to complete.

Accredited Wealth Management Advisor (AWMASM): This designation will gain advanced, yet practical knowledge about critical aspects of the financial services industry: asset management, allocation and selection; investment

performance and strategies; and taxation of investment products. The course also includes training in investment for retirement, strategies for small business owners, and the management of deferred compensation plans. In addition, instruction will cover insurance, estate planning, asset protection and tax reduction issues.

- To obtain this designation, a professional must successfully complete the program;
- Pass the final examination; and
- Comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

NAPFA Registered Financial Advisor®: This designation is the top level of membership in the National Association of Personal Financial Advisors (NAPFA). All NAPFA-Registered Financial Advisors® must have three years of comprehensive financial planning experience, have a sample comprehensive financial plan pass a peer review process. All NAPFA-Registered Financial Advisors® must possess a Bachelor's degree from an accredited institution. Currently, new NAPFA-Registered Financial Advisors® must also possess either the Certified Financial Planning™ designation awarded by the Certified Financial Planning Board of Standards, Inc., or the American Institute of Certified Public Accountants' Personal Financial Specialist (CPA/PFS) credential. All NAPFA-Registered Financial Advisors® must also adhere to NAPFA's Fiduciary Oath, Standards of Membership and Affiliation, and Bylaws. NAPFA-Registered Financial Advisors® must also comply with NAPFA's industry-leading strict continuing education requirements of sixty (60) hours every two (2) years. All NAPFA-Registered Financial Advisors® provide investment and/or financial advice on a strictly Fee-Only basis as defined by NAPFA, and continue to meet NAPFA's standards for strong character and adherence to the laws and regulation governing the profession.

Louis P. Stanasolovich, CFP®

Date of birth: February 5, 1957

Educational Background:

- Bachelor of Science degree in Accounting from Penn State University, 1979
- CFP® designation obtained in 1984

Business Experience:

- President, CEO, CCO, CIO, Legend Financial Advisors, Inc.® from January, 1994 to Present
- President, CEO, CCO, CIO, The Company Investment Management, Inc. from October, 2009 to Present

Disciplinary History: None

Other Business Activities: Editor and Chief Operations Manager, Wealth Advisor Publishing, Inc. that publishes the *Risk-Controlled Investing* Newsletter and *Global Economic and Investment Analytics*

Mr. Stanasolovich was a participant of the TD Ameritrade Advisor Panel, has been selected to assist the CFP® Board's Board of Examiners reviewing various test questions for the CFP® Certification Examination offered by the Certified Financial Planner® Board of Standards, Inc. as well as the IAFP Board from 1988 to 1992.

Additional Compensation: None

Supervision:

Louis P. Stanasolovich's compliance related activities are supervised by Diane M. Pearson, CFP®, PPC™, CFDA™. Ms. Pearson reviews Mr. Stanasolovich's investment advisory work through frequent office interactions as well as remote interactions. Ms. Pearson also reviews Mr. Stanasolovich's activities through The Company's client relationship management system.

Diane M. Pearson, CFP®, PPC™, CFDA™'s contact information:
(866) 280-4896
Wealth@TheCompany.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Diane M. Pearson, CFP[®], PPC[™], CDFA[™]

Date of birth: July 20, 1964

Educational Background:

- Associate degree in Accounting, Robert Morris University, 1983.
- Bachelor of Science degree in Management, Robert Morris University, 1985
- Registered 529 Plan Consultant through the www.savingforcollege.com

Business Experience:

- Wealth Advisor, Legend Financial Advisors, Inc.[®], from January, 1998 to Present
- Senior Assistant Financial Planner, Legend Financial Advisors, Inc.[®], from January, 1994 to January, 1998.
- Wealth Advisor, The Company Investment Management, Inc., from October, 2009 to Present.

Disciplinary History: None

Other Business Activities:

Diane M. Pearson was a participant of National Association of Women Business Owners, was a participant of the TD Ameritrade Advisor Panel, has been selected to assist the CFP[®] Board's Board of Examiners reviewing various test questions for the CFP[®] Certification Examination offered by the Certified Financial Planner[™] Board of Standards, Inc.
Shareholder of Smart Divorce Institute, LLC

Additional Compensation: None

Supervision:

Diane M. Pearson's compliance related activities are supervised by the Chief Compliance Officer. Ms. Pearson's work is reviewed through frequent office interactions as well as remote interactions. Ms. Pearson's activities are reviewed through The Company's client relationship management system.

Chief Compliance Officer contact information:

(866) 280-4896

Wealth@TheCompany.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

James J. Holtzman, CFP[®], CPA[®] Inactive

Date of birth: January 25, 1974

Educational Background:

- Bachelor of Science, Administration and Management, La Roche College, 1996.
- Bachelor of Science, Accounting, La Roche College, 1996.
- Registered Section 529 Plan Consultant through the www.savingforcollege.com

Business Experience:

- Wealth Advisor, Legend Financial Advisors, Inc.[®], from December, 2003 to Present.
- Senior Assistant Financial Planner, Legend Financial Advisors, Inc.[®], from May, 2001 to December, 2003.
- Wealth Advisor, The Company Investment Management, Inc., from October, 2009 to Present.
- Financial Analyst, Mercer Allied Company, L.P., from November, 1999 to May, 2001.
- Financial Planner, The Ayco Company, Inc., from November, 1999 to May, 2001.
- Accountant, Epstein, Tabor & Schorr, from July, 1998 to November, 1999.

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

James J. Holtzman's compliance related activities are supervised by the Chief Compliance Officer. The Chief Compliance Officer reviews Mr. Holtzman's work through frequent office interactions as well as remote interactions. The Chief Compliance Officer reviews Mr. Holtzman's activities through The Company's client relationship management system.

Chief Compliance Officer contact information:
(866) 280-4896

Wealth@TheCompany.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Bradley M. Pendzick, CFP®, AWMA®, Assistant Advisor

Date of birth: December 4, 1989

Educational Background:

- Bachelor of Science in Finance, University of Pittsburgh, 2012.

Business Experience:

- Assistant Wealth Advisor, Legend Financial Advisors, Inc.® from May, 2012 to Present
- Assistant Wealth Advisor, The Company Investment Management, Inc., from May, 2012 to Present
- Finance Intern, Legend Financial Advisors, Inc.® from November, 2009 to May, 2012

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Bradley M. Pendzick's compliance related activities are supervised by the Chief Compliance Officer. The Chief Compliance Officer reviews Mr. Pendzick's work through frequent office interactions as well as remote interactions. The Chief Compliance Officer also reviews Mr. Pendzick's activities through The Company's client relationship management system.

Chief Compliance Officer contact information:

(866) 280-4896

Wealth@TheCompany.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None

Vincent T. Strangio, CFP[®], PPC[™], Senior Assistant Advisor

Date of birth:

Educational Background:

- Bachelor of Science in Economics, Fairfield University of Connecticut, 1991

Business Experience:

- Senior Wealth Assistant Advisor, Legend Financial Advisors, Inc.[®], from December, 2013 to Present
- Senior Wealth Assistant Advisor, The Company Investment Management, Inc., from December, 2013 to Present
- JKS Financial – Director of Operations
- Federated Investors – Wholesaler
- Business Owner
- Alliance Bernstein - Wholesaler

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Vincent T. Strangio's compliance related activities are supervised by the Chief Compliance Officer. The Chief Compliance Officer reviews Mr. Strangio's work through frequent office interactions as well as remote interactions. The Chief Compliance Officer also reviews Mr. Strangio's activities through The Company's client relationship management system.

Chief Compliance Officer contact information:

(866) 280-4896

Wealth@TheCompany.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None

Amber S. Makokele, Investment Operations Coordinator

Date of birth: March 1, 1989

Educational Background:

- Bachelor of Science in Business Administration focused in Finance and Real Estate, Clarion University of Pennsylvania, 2011

Business Experience:

- Investment Operations Coordinator, Legend Financial Advisors, Inc.[®], December, 2013 to Present
- Investment Operations Coordinator, Legend Financial Advisors, Inc.[®], December, 2013 to Present
- Pruco Securities, LLC from January, 2012 to December 2013
- Prudent Insurance Company of America, January 2012 to December 2013

Supervision:

Amber S. Makokele's compliance related activities are supervised by Louis P. Stanasolovich, CCO. He reviews Ms. Makokele's work through frequent office interactions as well as remote interactions. He also reviews Ms. Makokele's activities through The Company's client relationship management system.

Chief Compliance Officer contact information:

(866) 280-4896

Wealth@TheCompany.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None