

**Item 1 – Cover Page**

**Form ADV Part 2A Brochure  
March 1, 2018**

Family Legacy, Inc.  
104 Broadus Avenue  
Greenville, SC 29601  
864-233-0808  
[www.falegacy.com](http://www.falegacy.com)

This Brochure provides information about the qualifications and business practices of Family Legacy, Inc. If you have any questions about the contents of this Brochure, or would like to request a copy free of charge, please contact Christopher A. Brown at 864-233-0808 or [cbrown@falegacy.com](mailto:cbrown@falegacy.com).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Family Legacy, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Family Legacy, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 – Material Changes**

Patrice Sebastian is now the Chief Compliance Officer of the firm.

**Item 3 -Table of Contents**

Item 1 – Cover Page .....	i
Item 2 – Material Changes.....	ii
Item 3 -Table of Contents .....	iii
Item 4 – Advisory Business .....	1
Item 5 – Fees and Compensation .....	3
Item 6 – Performance-Based Fees and Side-By-Side Management .....	5
Item 7 – Types of Clients .....	5
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	5
Item 9 – Disciplinary Information .....	6
Item 10 – Other Financial Industry Activities and Affiliations .....	6
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading .....	7
Item 12 – Brokerage Practices .....	9
Item 13 – Review of Accounts .....	10
Item 14 – Client Referrals and Other Compensation .....	11
Item 15 – Custody.....	11
Item 16 – Investment Discretion.....	12
Item 17 – Voting Client Securities .....	12
Item 18 – Financial Information.....	13

**Item 4 – Advisory Business**

Family Legacy, Inc. has been serving clients since May of 1995. The advisory firm is owned by Christopher A. Brown. William W. Brown, the founder of the business continues to take an active role in the business. Together, they form a father and son team that has backgrounds in tax and accounting. Both are Certified Public Accountants and Personal Financial Specialists. Christopher A. Brown is authorized by the Certified Financial Planner Board of Standards (CFP Board) to use the CERTIFIED FINANCIAL PLANNER™ and CFP® certification marks in accordance with CFP Board certification and renewal requirements.

Family Legacy, Inc. provides portfolio management and financial planning services. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, Family Legacy, Inc. develops a client's personal investment policy and creates and manages a portfolio based on that policy. Our firm enters into a portfolio management agreement with all clients making investment decisions for the account according to the investment objectives and financial circumstances as shown in the client's investment policy statement.

Family Legacy, Inc. provides this service to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and corporations. Family Legacy, Inc. primarily manages advisory accounts on a discretionary basis. Factors considered in making investment decisions include the account size, risk tolerance and the client's investment experience and any other pertinent information discussed with a client during consultation or in the process of developing the client's investment policy.

Family Legacy, Inc. assists each client in determining the amount of risk versus return in various investment vehicles and helps the client in allocating his or her assets between the various asset classes.

Family Legacy, Inc. will maintain periodic and appropriate communication with the client. Family Legacy, Inc. monitors the performance of the account and continually assesses the client's risk tolerance and changes the asset allocation as necessary.

Family Legacy, Inc. manages money on a discretionary basis in primarily two ways.

Since the company's inception, the company has utilized individually managed accounts, which for larger accounts, have been primarily made up of individually traded securities.

For individually managed accounts, our philosophy is conservative and emphasizes high-quality, high-yielding stocks and other large-cap stocks for the majority of portfolio assets. We also use mid-cap and other stocks to a lesser degree. Government bonds, preferred stocks, convertible securities, real estate investment trusts, no-load mutual funds, exchange traded funds and other investment vehicles are utilized to achieve greater diversification and to include international investing and other fixed instruments. Mutual funds and exchange traded funds will be selected on the basis of any or all of the following criteria: The fund's performance history, the industry sector in which the fund invests, the track record of the fund's manager, the fund's investment objectives, the fund's management style and philosophy and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the clients' behalf. Clients will retain individual ownership of all securities.

Family Legacy, Inc. also offers asset allocation portfolios consisting of no-load mutual funds. These accounts may also utilize exchange traded funds and other pooled investment vehicles within Family Legacy, Inc.'s discretion. The use of no-load mutual funds, ETFs and other pooled investment vehicles allows Family Legacy, Inc. to diversify accounts through the use of these investments rather than the selection of individual stocks, bonds and other securities described above. Accounts that are smaller than those accepted by Family Legacy, Inc. as separately managed accounts described above (which have a minimum account size of \$250,000) may be accepted as asset allocation portfolios. In all cases minimum account size is negotiable.

Asset allocation portfolios using mutual funds, ETFs and other pooled investment vehicles may be used for any size account depending on the client's preferences and circumstances.

Family Legacy, Inc.'s asset allocation portfolios are constructed as model portfolios of mutual funds, ETFs and other pooled investment vehicles. Client assets are managed according to a model that is suitable to the client's individual investment objectives and financial circumstances. Clients may place reasonable restrictions on assets selected by Family Legacy, Inc. for implementation of the client's portfolio.

Family Legacy, Inc. also provides advisory services to participant-directed employee retirement benefit plans on a non-discretionary basis. Adviser will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed.

Family Legacy, Inc. will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

Family Legacy, Inc. will recommend changes in the plan's investment vehicles as may be appropriate from time to time, and will review the plan's investment vehicles and investment policy as necessary.

Family Legacy, Inc. will generally engage new clients in a discovery process to define goals and explore a client's values as they relate to their personal financial situation. We will also meet with clients on a periodic basis to review and update their individual financial plan as appropriate.

Family Legacy, Inc. may offer investment advice and financial planning services on a consultation basis. Fees are charged on a fixed-fee basis, and a range of the fees to be charged for these services are agreed upon before the work commences. In the client engagement letter, an actual schedule of fees and dates to be paid are included. The client may terminate these services at any time and get a full refund of any unearned portion of the fees upon written request.

As of December 31, 2017, Family Legacy managed for clients and related parties \$133,627,994 million dollars under discretionary management. The Firm advised on another \$6,574,491 million dollars of non-discretionary assets.

### Item 5 – Fees and Compensation

Family Legacy, Inc. uses the following fee schedules for assets under management and ongoing financial planning in its individually managed accounts.

#### Value of Account Annual Fee

0 - \$3 Million	1.75%
Next \$5 Million	1.4%
Greater than \$8 Million	1.0%

Family Legacy, Inc. charges a management fee on asset allocation portfolios that is less than the fee charged for separately managed accounts on account values above \$250,000. While fees on these portfolios paid to Family Legacy, Inc. may be lower, aggregate fees paid by the client may be higher than individually managed portfolios because of expense ratios charged by the pooled investment vehicles paid by the end client. Asset allocation portfolios are not specifically tax-managed, which Family Legacy, Inc. provides for taxable separately managed accounts.

Family Legacy, Inc. uses the following fee schedules for assets under management and ongoing financial planning in its asset allocation portfolios.

#### Value of Account Annual Fee

0-\$250,000	1.75%
Next \$250,000	1.50%

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Next \$500,000	1.25%
Next \$2,000,000	1.00%
Amounts greater than \$3,000,000	.75%

Family Legacy, Inc. uses the following fee schedules for non-discretionary advisory services performed for employee directed retirement plans.

**Value of Account Annual Fee**

0-\$5,000,000	.5%
Next \$5,000,000	.35%
Amounts greater than \$10,000,000	.25%

Fees are generally payable quarterly in advance. The initial billing period starts upon the receipt of any funds or securities in the account. The first payment will be prorated to cover the period from the date the account is opened through the end of the current full calendar quarter. Clients will be invoiced in advance at the beginning of each calendar quarter based upon the value of the account at the end of the previous quarter. In limited situations, fees are negotiable. If a portfolio management agreement is terminated within five days of execution, fees are completely refunded. If a portfolio management agreement is otherwise terminated, refunds are made on a pro-rata basis upon written request.

Non-discretionary fees for employee directed retirement plans are billed quarterly in arrears. In limited situations, fees are negotiable.

All fees paid to Family Legacy, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of Family Legacy, Inc. In that case, the client would not receive the services provided by Family Legacy, Inc., which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition or objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Family Legacy, Inc. to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisor services being provided. Additionally, the custodian used will typically charge a nominal fee on a per-trade basis.

Family Legacy, Inc.'s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Such charges, fees, and commissions

are exclusive of and in addition to Family Legacy, Inc.'s fee, and Family Legacy, Inc. shall not receive any portion of these commissions, fees and costs.

Fees and account size are negotiable. For smaller accounts Family Legacy will generally ask that the client enter a periodic investment plan where the client adds an automatic deposit to the account on a regular basis.

We charge a fixed fee for initial consultation which generally includes financial planning services based on an agreed upon amount decided with the client before beginning the engagement. In most initial cases, the client will agree to an engagement letter. In the client engagement letter, an actual schedule of fees and dates to be paid are included. For on-going consultation or special projects the client may request to be billed as the work progresses. The client may terminate these services at any time and receive a full refund of any unearned portion of the fees upon written request.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

Family Legacy, Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

#### **Item 7 – Types of Clients**

Family Legacy, Inc. provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable organizations, foundations, endowments, trusts, and corporations.

The minimum size for new individually managed accounts is \$250,000. However, Family Legacy, Inc., under certain circumstances, will negotiate this minimum account size. This minimum account size will apply to new accounts and will not change the status for existing accounts. There is no minimum account size for an asset allocation portfolio.

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

For individually managed accounts Family Legacy utilizes common stocks, ADR's, REIT's, bonds, mutual funds, ETF's, publicly traded limited partnerships, and other publicly traded instruments to build portfolios based on each client's individual risk tolerance.



We generally hold securities over a long period of time and seek capital appreciation in conjunction with income to create long-term sustainable growth. Our style is that of long-term investors seeking stability with reasonable returns. We do not hold ourselves out as traders. We are an investment firm seeking wise investments over a long period of time.

For asset management portfolios, we search for no load funds with no transaction fees and reasonable expense ratios that are generally rated three stars and greater in Morningstar. We also seek to utilize high quality exchange traded funds (ETFs). We work diligently to design portfolios that will fit within a clients stated risk tolerance.

For individually directed retirement plans, we recommend high quality mutual funds and exchange traded funds that will meet the plan's objectives as outlined in their investment policy statement.

In all of our portfolios, we seek to minimize risk. Philosophically, we are willing to let go some returns on the upside in the attempt to mitigate downside risk. Our portfolios tend to be more conservative rather than aggressive.

We use a variety of research sources such as mutual fund prospectuses, Morningstar, Y-Charts, Fi360 and others to search, evaluate, and review investments. While we make every effort to design portfolios that will meet our client's goals, investing in securities involves risk of loss that clients should be prepared to bear. Prior rates of return are not guaranteed in future periods.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Family Legacy, Inc. or the integrity of its management. Family Legacy, Inc. has no information applicable to this Item.

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

Family Legacy, Inc. is commonly associated with William W. Brown, CPA, PA. William W. Brown began this CPA firm in 1977, and the firm continues to operate. Christopher A. Brown, CPA, PFS, CFP® currently owns the CPA firm. William W. Brown, CPA, PFS, Vice President of Family Legacy, Inc., and Christopher A. Brown, CPA, PFS, President and CCO of Family Legacy, Inc., are actively

involved in personal financial counseling, estate planning, and to a lesser degree, traditional income tax services.

Approximately thirty percent (30%) of the available time for William W. Brown is spent directly with Family Legacy, Inc., and approximately ninety percent (90%) of the time of Christopher A. Brown, is spent directly in Family Legacy, Inc.

In August 2005, William W. Brown and Christopher A. Brown formed Legacy Insurance, LLC to seek independent solutions to insurance issues, and are licensed as independent insurance agents. During the course of providing investment advisory services and financial planning services, we may recommend insurance products to fulfill clients' needs and introduce clients to insurance brokers for the purchase of insurance products. If a client elects to purchase any insurance product, we may receive insurance commissions that are separate and distinct from the advisory fee of Family Legacy, Inc. However, clients are not under any obligation to engage these individuals when considering implementation of recommendations. The implementation of any or all insurance product recommendations is solely at the discretion of the client.

### **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

#### **Statement of General Policy**

This Code of Ethics ("Code") has been adopted by Family Legacy, Inc. and is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act"). This Code establishes rules for all employees of Family Legacy, Inc. and is designed to, among other things, govern personal securities trading activities in the accounts of employees. The Code is based upon the principal that Family Legacy, Inc. and its employees owe a fiduciary duty to Family Legacy, Inc.'s clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by Family Legacy, Inc. continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

Pursuant to Section 206 of the Advisers Act, both Family Legacy, Inc. and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that Family Legacy, Inc. has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

Family Legacy, Inc. and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided;
- The duty to obtain best execution for a client's transactions where the Firm is in a position to direct brokerage transactions for the client;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs and circumstances; and
- A duty to be loyal to the clients.

In meeting its fiduciary responsibilities to its clients, Family Legacy, Inc. expects every employee to demonstrate the highest standards of ethical conduct for continued employment with Family Legacy, Inc. Strict compliance with the provisions of the Code shall be considered a basic condition of employment with Family Legacy, Inc.

Family Legacy, Inc.'s reputation for fair and honest dealing with its clients has taken considerable time to build. This standing could be seriously damaged as the result of even a single securities transaction being considered questionable in light of the fiduciary duty owed to our clients. Employees are urged to seek the advice of Patrice Sebastian, the Chief Compliance Officer, for any questions about the Code or the application of the Code to their individual circumstances. Employees should also understand that a material breach of the provisions of the Code may constitute grounds for disciplinary action, including termination of employment with Family Legacy, Inc.

The provisions of the Code are not all-inclusive. Rather, they are intended as a guide for employees of Family Legacy, Inc. in their conduct. In those situations where an employee may be uncertain as to the intent or purpose of the Code, he/she is advised to consult with Christopher Brown. Christopher Brown may grant exceptions to certain provisions contained in the Code only in those situations when it is clear beyond dispute that the interests of our clients will not be adversely affected or compromised.

All questions arising in connection with personal securities trading should be resolved in favor of the client even at the expense of the interests of employees.

A complete copy of our Code of Ethics is available to clients or prospective clients at your request.

**Item 12 – Brokerage Practices**

For discretionary individually managed accounts, Family Legacy, Inc. requests that it be provided with written authority to determine which securities and the amounts of securities are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

Clients in need of brokerage and custodial services may have Fidelity Brokerage Services, Inc. or TD Ameritrade, Inc. recommended to them. Family Legacy, Inc. receives benefits that it would not receive if it did not offer investment advice and utilize these firms as custodians.

Family Legacy, Inc. may utilize block trades where possible and when advantageous to clients. The blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. Block trading allows Family Legacy, Inc. to execute equity trades in a more-timely, more-equitable manner. However, no transactions by directors, officers or employees of Family Legacy, Inc. will be included in a client block unless said trade meets a de minimis exemption, involving less than 1,000 shares in a one-month period, in an issuer with a market capitalization of \$3 billion or greater. Block trades executed at TD Ameritrade and Fidelity Investments will be placed at different times.

Orders placed through Fidelity's electronic trading system are sent directly to the Markets via Fidelity's computer system. Orders placed through TD Ameritrade's electronic trading system are sent directly to the Markets via TD Ameritrade's computer system. Orders sent first do not necessarily trade first nor do these orders necessarily execute at terms more or less favorable than orders sent later.

Family Legacy, Inc. utilizes the services of Fidelity Brokerage Services, Inc. and TD Ameritrade Institutional. While there is no direct linkage between the investment advice given to clients and Family Legacy, Inc.'s participation in Fidelity's programs or TD Ameritrade's programs, economic benefits are received by Family Legacy, Inc. which would not be received if Family Legacy, Inc. did not give investment advice to clients. These benefits do not depend on the amount of transactions directed by Family Legacy, Inc. to Fidelity or TD Ameritrade.

These benefits include: A dedicated trading desk that services advisors exclusively, a dedicated service group and an account services manager dedicated to Family Legacy, Inc.'s accounts, access to a real-time order matching system, ability to "block" client trades, electronic download of trades, balances and positions in portfolio management software, access, for a fee, to an electronic

interface with custodial account software, duplicate and batched client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with the federal and state requirements), quarterly newsletters, access to various mutual funds, many funds NOT affiliated with Fidelity or TD Ameritrade, ability to have loads waived for Family Legacy, Inc.'s clients who invest in certain loaded funds, when certain conditions are met and maintained and the ability to have custody fees reduced or waived (when negotiated by the advisor and allowed under certain circumstances).

Family Legacy, Inc. also receives certain vendor discounts on software as part of doing business with Fidelity and TD Ameritrade. Family Legacy, Inc. will always act in the best interest of its clients, consistent with its fiduciary duty, including when evaluating custodians/broker-dealers. Moreover, Family Legacy, Inc. recommends custodians/ broker-dealers based on its duty to seek "best execution," which has the obligation to seek to execute securities transactions clients, consistent with its fiduciary duty, including accurate execution, prompt reconciliation, and trade error resolution, competitive commission costs, access to low transaction fee ETFs, and professionalism that ultimately benefits our clients. While Family Legacy, Inc. has a reasonable belief that Fidelity and TD Ameritrade are able to obtain best execution and competitive prices, Family Legacy, Inc. will not be independently seeking best execution price capability through other broker-dealers.

We review best execution reports as provided by Fidelity and TD Ameritrade on a quarterly basis to reevaluate custodial performances.

Family Legacy, Inc. reserves the right to decline acceptance of a broker dealer other than Fidelity Investments or TD Ameritrade, if Family Legacy, Inc. believes that this would adversely affect Family Legacy, Inc.'s duty to obtain best execution.

For non-discretionary employee retirement plan services, Family Legacy does not arrange for the execution of securities transactions for employee retirement benefit plans as part of this service. Transactions are executed directly through employee plan participation and the services of the TPA selected by the plan sponsor.

### **Item 13 – Review of Accounts**

Discretionary portfolio management accounts are reviewed in their entirety initially upon engagement and quarterly, semi-annually or annually thereafter. Periodic reviews with the clients to review their individual performance, monitor risk tolerance and change asset allocation, as determined by client.

Non-discretionary employee benefit retirement plan assets are reviewed on an annual basis.

For discretionary portfolio management accounts, reports are prepared and delivered quarterly. For non-discretionary retirement plan advice, periodic reports and online access are provided by the plan administrator.

**Reviewers:**

Margaret E. Jacobs

Patrice L. Sebastian, CPA/CFF, CVA, CCO

Christopher A. Brown, CPA, PFS, CFP® President

William W. Brown, CPA, PFS, Vice President

Christopher A. Brown and/or William W. Brown review all accounts.

**Item 14 – Client Referrals and Other Compensation**

At this time Family Legacy, Inc. has no active solicitor relationships.

**Item 15 – Custody**

Family Legacy, Inc. is not a corporate trustee and does not act as a custodian for client funds or securities. However, when requested by clients, William W. Brown or Christopher A. Brown will act as trustee or personal representative on a client's behalf which constitutes custody under the Advisers Act. As part of the safeguarding requirements for the funds and securities over which it has custody (beyond constructive custody via direct fee deduction), Family Legacy, Inc. has retained an independent public accountant to conduct an annual surprise examination of these assets

All clients receiving portfolio management services should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Family Legacy, Inc. urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Should you note any discrepancy including failure to receive a periodic statement, please call Patrice Sebastian, the Chief Compliance Officer, at 864-233-0808.

**Item 16 – Investment Discretion**

Family Legacy, Inc. usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Family Legacy, Inc. observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to Family Legacy, Inc. in writing.

**Item 17 – Voting Client Securities**

Family Legacy, Inc. will exercise proxy voting authority for clients who agree to participate in the proxy voting services offered by Broadridge, Inc. We believe that this service provides the most consistent and thorough methodology of voting in shareholder interests. We will not exercise proxy voting authority for clients who do not wish to participate in this service. Clients may opt out of this service at no cost. Clients may request a complete copy of our proxy voting policy and procedures and records regarding how their proxy statements have been voted by contacting any of our firm's members. The cost of this service is born by the advisor. There is no additional cost to the client.

Clients may obtain a copy of Family Legacy's complete proxy voting policies and procedures upon request. Clients may also obtain information from Family Legacy, Inc. on how any proxies were voted on behalf of their account(s).

Family Legacy, Inc. also has an agreement with Broadridge, Inc. to process and administer an asset recovery service covering Global Securities Class Action lawsuits for its clients. As payment for this service, Broadridge will receive a fee of 20% of the total reimbursement of any securities class action settlement it collects. Broadridge will then distribute the remaining funds collected directly to eligible clients for each class action settlement.

**Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about an adviser's financial condition. Family Legacy, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.