

PART 2A FORM ADV

AS OF:

MARCH 28, 2019

**EmergingWealth Investment Management, Inc.[®]
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www.EmergingWealth.com (Under Construction)
CRD# 151471**

The Securities and Exchange Commission (SEC) requires this regulatory disclosure document to be called a “Brochure”.

This document provides information about the qualifications and business practices of EmergingWealth Investment Management, Inc.[®] If you have any questions about the contents, please contact us at: (866) 280-4896. The information within has been filed with the United States Securities and Exchange Commission (SEC), and any state securities authority requiring. *

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

* The SEC does not approve and/or verify any firms’ brochure.

Table of Contents

Material Changes	5
Annual Update:	5
Material Changes Since The Last Update:	5
Additional Copies Available:	5
Advisory Business.....	6
Firm Description:	6
Principal Owners:	6
Types of Advisory Services:	6
Investment Services:.....	6
Discretionary Investment Management:.....	6
Discretionary Investment Management Consulting Services:	7
Client Imposed Restrictions:	8
Wrap Fee Programs:	8
Client Assets:.....	8
Fees and Compensation.....	8
Compensation Description/Fee Billing:	8
Discretionary Investment Management Fee Schedule (For Clients Who Custody at Shareholders Service Group/Pershing and Folio Institutional after April 1, 2018):	10
Discretionary Investment Management Fee Schedule [For Clients Who Custody at Folio Institutional (Folio) Before March 31, 2018]:	10
Past Due Accounts:	13
Other Fees Or Expenses:	13
Termination of Agreement:	14
Securities/Investment Products Compensation:	14
Not Affiliated/Agent:	14
Conflict Of Interest:	14
Commissions And Other Sales Compensation:	14
Other Advisory Fees:	15
Sub-Advisory Fee:	15
Staff Time:	15
Performance-Based Fees And Side-By-Side Management	15
Types of Clients	15
Description:.....	15
Methods of Analysis, Investment Strategies and Risk of Loss	16
Methods of Analysis/Investment Strategy:	16

Risk of Loss:	16
Disciplinary Information	17
Criminal Or Civil Action:	17
Administrative Proceeding Before The SEC Or Any Other Regulatory Agencies:	17
Self-Regulatory Organization Violations:	17
Other Financial Industry Activities and Affiliations	17
Broker-Dealer Affiliations:	17
Other Affiliations:	18
Related Persons:	18
Other Investment Advisors:	18
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	18
Code of Ethics:	18
Participation or Interest in Client Transactions:	19
Personal Trading:	19
Brokerage Practices	19
Selecting Brokerage Firms:	19
Research And Other Soft Dollars:	20
Brokerage For Client Referrals:	20
Directed Brokerage:	20
Order Aggregation:	20
Trade Error Disclosure:	21
Folio Institutional:	21
Shareholders Service Group:	21
Review of AccountS	21
Discretionary Investment Management And Discretionary Investment Management Consulting:	21
Periodic Reviews:	21
Performance Reports:	21
Client Referrals and Other Compensation	21
Client Referrals To The Company:	21
Solicitor Referrals:	22
Referrals To Other Professionals:	22
Other Compensation:	22
Custody	22
Investment Discretion	23
Discretionary Authority for Trading:	23

Voting Client Securities.....23

Financial Information.....23

 Prepayment Of Fees:.....23

 Bankruptcy:.....23

SUPPLEMENT TO PART 2A FORM ADV (PART 2B OF FORM ADV):24

 Education and Business Standards:24

 Professional Certifications:24

 Certified Financial Planner (CFP®):.....24

 Chartered Financial Analyst (CFA®):.....24

 Certified Public Accountant (CPA®):25

 Professional Plan Consultant (PPC™):.....25

 Certified Divorce Financial Analyst (CDFA®):26

 Accredited Wealth Management AdvisorSM (AWMA®):26

 NAPFA Registered Financial Advisor®:.....27

 Firm Advisory Staff:28

 Louis P. Stanasolovich, CFP®28

 Diane M. Pearson, CFP®, PPC™, CDFA®29

 James J. Holtzman, CFP®, CPA® Inactive30

 Bradley M. Pendzick, AWMA®31

 Alex G. Hendrickson, AWMA®32

MATERIAL CHANGES

Annual Update:

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

Material Changes Since The Last Update:

As of April 1, 2018, all new clients of the Discretionary Investment Management service who custody their assets at Folio Institutional will be billed using the same fee schedule as clients whose assets are custodied at Shareholders Service Group/Pershing.

Additional Copies 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 or by E-mail at: wealth@emergingwealth.com.

ADVISORY BUSINESS

EmergingWealth Investment Management, Inc.[®] (“The Company”) reserves the right to add, delete and/or modify any or all the services listed below as it may deem appropriate, in writing, with a thirty (30) day notice to the affected clients. Furthermore, the fees for the affected services provided to the client may change as well.

Firm Description:

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:

Investment Services:

The Company offers the following Investment Services to individuals, families, qualified and non-qualified retirement plans, non-profit organizations and corporate entities on a discretionary basis.

The assets to be managed and/or overseen will be designated by the client.

An analysis of the client’s current family, financial, long-term objectives and the preparation of recommendations will be made by The Company.

Clients will retain individual ownership of all investments or through entities so designated by the Client.

The Company/Subadvisor will attempt, on a best efforts basis, to minimize income tax events on a yearly or multi-year basis to the best of its ability if appropriate.

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

Discretionary Investment Management:

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.

Alternatively, The Company may manage securities portfolios directly as opposed to utilizing any Subadvisor.

The Company and/or the Subadvisor will manage securities portfolios (each has its own strategy) on an ongoing discretionary basis. After an initial discussion about the client's comfort with risk, their individual financial goals and objectives as well as the client's income tax situation to a degree, The Company will develop an initial investment strategy to address the client's needs. The recommended investment strategy will incorporate a portfolio of investments appropriate for the clients' circumstances. Upon mutual agreement with the client regarding the recommended investment strategy, a portfolio will be implemented. Thereafter, The Company/Subadvisor will provide ongoing management of the investment assets at its sole discretion without first consulting the client. However, should the client circumstances and/or wishes change after the initial recommendations are developed, the client will need to notify The Company. The Company will notify the Subadvisor of any changes. The Company will then consult with the client to develop a new investment strategy or modify the existing investment strategy.

Most portfolios can include open-end and closed-end mutual funds and Exchange-Traded products, but some portfolios in certain cases could include individual securities such as bonds, 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; statistical measures; valuation of the investment or asset class as are applicable; the mutual fund/investment manager; the mutual fund/investment manager's style and philosophy; and the mutual fund/investment manager's fee structure among other criteria as well as their income tax-efficiency, if applicable.

Investment position weightings within a portfolio managed with discretion by The Company will be based upon the criteria mentioned above in addition to the client's income tax circumstances, if applicable, as well as the type of portfolio they select.

Discretionary Investment Management Consulting Services:

This Investment Service is similar to the Discretionary Investment Management service, but may or may not involve more complex assets and/or accounts to manage.

This service could include accounts and/or investments that are difficult to value such as retirement plan balances of the individual client(s) and/or variable annuities except for once per year, or could possibly be aggregated with accounts and/or with family member accounts. Some of the assets may possibly be held at Custodians that either do not offer electronic downloads and/or do not allow The Company to have discretionary authority over. These difficult to value assets may also result in more staff time than those assets held at one or more of The Company's preferred Custodians.

Also, multiple portfolios for this service can be aggregated under a single fee.

This service may also include the management of assets that are held at The Company's Preferred Custodians where The Company does have discretionary authority.

If the assets are held at Custodians not on The Company's Preferred Custodians list, The Company will advise the client as to how to position those assets. Upon direction by The Company trade executions of such securities will need to be traded directly by the client or in conjunction with the client and The Company. It is solely the responsibility of the client to reposition these assets in this type of situation although; The client can request The Company's assistance.

The Company and/or the Sub-Advisor will manage securities portfolios only at one of the preferred Custodians on an ongoing basis.

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 should notify The Company in writing, in advance, of any restrictions regarding their investment portfolios.

Wrap Fee Programs:

The Company does not participate in any wrap fee programs.

Client Assets:

As of December 31, 2018, The Company manages approximately \$11,863,814 in assets for approximately thirty (30) clients. The Company does not manage investments on a non-discretionary basis. All the assets are managed only on a discretionary basis.

FEES AND COMPENSATION

Compensation Description/Fee Billing:

The Company only receives fees from its clients. This is known as a Fee-Only compensation structure as opposed to a Fee and Commission (also known as Fee-Based) compensation structure, or a Commission-Only compensation structure offered by other types of advisors and brokers. Generally, fees are not negotiable.

However, in extremely rare circumstances, The Company, in their sole discretion, may waive their minimum fee and/or adjust the fee charged based upon certain criteria (e.g., historical relationship, type of assets, amount of assets to be added, anticipated future additional assets, dollar amounts of assets to be managed, anticipated future earning capacity, accounts owned by relatives of the client and/or businesses related to the client, account composition, etc.).

The Company may discount the listed advisory fees up to 30.0% subject to minimum applicable fees to law, insurance, accounting and other types of professional financial advisors and/or their firms. This discount is provided in the hope that these firms and their

associated individuals may recommend The Company and/or its affiliates 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.

For any service, a Client may terminate their relationship at any time and receive a prorata refund of any unearned fee. Similarly, any earned, unpaid fees will be due and payable upon termination.

For any service, 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.

Also, if a Client's account has tradable securities in it, even though it is not managed, it is considered part of the billable assets. If a Client's account is used strictly as a checking account, it is not part of the billable assets.

If investment accounts have been established at a custodian that The Company and the client have previously agreed upon here-in-after known as one of The Company's preferred Custodians, the fee will be billed directly from such account.

The client authorizes The Company, under its discretionary authority, to liquidate positions held at one of The Company's Preferred Custodians in the portfolio in order to provide sufficient funds for fee payment.

The client authorizes The Company to deduct the initial payment as well as all subsequent payments from the client's designated account(s) held at The Company's Preferred Custodians.

At The Company's discretion, and only in unusual circumstances, the initial payment will be payable by check to "EmergingWealth Investment Management, Inc.®". Subsequent payments then will be made from an investment account(s) at one of The Company's preferred Custodians.

In the event an investment account is not available to bill from, the client will be billed directly.

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

As stated above, The Company reserves the right to add, delete and/or modify any or all the services listed above, in writing, as it may deem appropriate with a thirty (30) day notice to the affected clients. Furthermore, the fees for the affected services provided to the client may change as well.

Each Custodian has its own fee schedule which has no relation to The Company's fee schedule. See the fee schedule for the Custodian at which the investments are being held for further information.

Discretionary Investment Management Fee Schedule (For Clients Who Custody at Shareholders Service Group/Pershing and Folio Institutional after April 1, 2018):

The fiscal quarterly fee for each portfolio (All portfolios inception prior to May 31, 2017 will be billed separately on a fiscal quarter basis except for non-adult children's accounts. All portfolios inception after May 31, 2017, will be billed on a combined basis per family entity including non-adult children's accounts 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.

The minimum fiscal quarterly advisory fee for investment management is \$750.00. This minimum fee may prevent The Company from providing services to small portfolios. Only one portfolio can be utilized to achieve this minimum fee. However, in extremely rare circumstances, The Company, in their sole discretion, may waive their minimum fee.

The Company has the discretion to waive the portfolio minimum size (value of \$250,000.00 if it deems it appropriate; i.e. for the client as well as the children of Clients and/or relatives that live in the same household as the client.).

The Company at its discretion may modify the fiscal quarterly fee calculation date due to any number of circumstances which affect either the client and/or The Company.

Clients that had selected Folio Institutional as the custodian are assessed a fee of 0.2% annually by Folio Institutional on all assets it holds in accounts. This includes trading fees, performance reporting and custody.

Discretionary Investment Management Fee Schedule [For Clients Who Custody at Folio Institutional (Folio) Who Retained The Company Prior To March 31, 2018]:

For the Discretionary Investment Management Service accounts at Folio, The Company's calendar quarterly fee schedule, as is Folio's, is applied separately (accounts are not aggregated to obtain a reduced fee) on each account.

The Company's lower fee schedule is offered as a result of negotiation with Folio due to the calendar quarterly fee schedule charged by Folio for their services. 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 quarterly 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.

Under the Discretionary Investment Management service, a client may have multiple accounts to meet the minimum calendar quarterly advisory fee.

The minimum calendar quarterly advisory fee for investment management services aggregated from all client accounts at Folio Institutional that The Company receives is \$600.00.

Only one portfolio type can be utilized to achieve this minimum fee.

However, in extremely rare circumstances, The Company, in their sole discretion, may waive their minimum fee.

Also, individual portfolios are subject to a minimum securities value for each portfolio of \$250,000.00, which is also subject to the minimum fiscal quarterly advisory fee.

The minimum fees and portfolio sizes may prevent The Company from offering the service to clients that cannot achieve these minimums.

The Company has the discretion to waive the portfolio minimum size (value of \$250,000.00 if it deems it appropriate; i.e. for the client as well as the children of Clients and/or relatives that live in the same household as the client.).

If the calendar quarterly fee calculation date is modified, then the calendar quarterly fees are due immediately, and subsequently in three months, six months, and nine months as well as on the same date(s) each year thereafter.

Clients that had selected Folio Institutional as the custodian are assessed a fee of 0.2% annually by Folio Institutional on all assets it holds in accounts. This includes trading fees, performance reporting and custody.

Discretionary Investment Management Consulting Fee Schedule:

For a single annual fee (The fee is normally recalculated once annually on or prior to the anniversary date, but split into four equal fiscal quarterly payments.), this type of fee schedule roughly follows the one for the Discretionary Investment Management Service,

but may or may not involve more complex assets and/or accounts to manage. This service could include accounts and/or investments that are difficult to value except for once per year, such as retirement plan balances of the individual client(s) and/or variable annuities, or could possibly be aggregated with accounts not held at one or more of The Company's Preferred Custodians and/or with family member accounts. Furthermore, The Company may not have discretionary authority over those assets held at Custodians other than The Company's Preferred Custodians in which case, The Company will advise the client as to how these assets are to be positioned.

In addition, these difficult to value assets can also result in more staff time to value than assets held at one or more of The Company's Preferred Custodians thereby possibly resulting in a higher fee.

Also, multiple portfolios can be included under this single fee.

The minimum fiscal quarterly advisory fee for Investment Management Consulting is \$750.00 for Custodians other than Folio Institutional. The minimum fiscal quarterly advisory fee for investment management services aggregated from all client accounts at Folio Institutional that The Company receives is \$600.00. Beginning April 1, 2018, the minimum fiscal quarterly advisory fee for Investment Management Consulting is \$750.00 for all Custodians.

Clients that had selected Folio Institutional as the custodian are assessed a fee of 0.2% annually by Folio Institutional on all assets it holds in accounts. This includes trading fees, performance reporting and custody.

Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000.00.

The minimum fees and portfolio sizes may prevent The Company from providing services to clients that cannot achieve these minimums. However, in extremely rare circumstances, The Company, in their sole discretion, may waive their minimum fee.

The Company has the discretion to waive the portfolio minimum size (value of \$250,000.00 if it deems it appropriate; i.e. for the client as well as the children of Clients and/or relatives that live in the same household as the client.).

The fee to be paid by the client to The Company is payable as follows: The fee shall be billed quarterly, the first of which is due upon the execution of the contract (in other words, fees are paid one fiscal quarter in advance), each subsequent quarter is due three months, six months, and nine months, respectively, after the anniversary date and on the same date(s) each year thereafter.

The Company, at its discretion, may modify the annual anniversary review date (this is the effective date for billing purposes only) due to any number of circumstances which affect either the client and/or The Company.

If the annual anniversary review date is modified, then the fiscal quarterly fees are due immediately, and subsequently in three months, six months, and nine months as well as on the same date(s) each year thereafter.

On or just prior to each annual anniversary date, The Company will determine the fee (normally paid in quarterly increments) for the next fiscal year and then notifies the client of its decision in writing. The client, at that point in time, can discuss The Company's decision. The Company reserves the right to not send a communication in writing if the fee does not change.

If The client's asset level increases or decreases by 20.00% or more in a fiscal year, the fee will automatically be reviewed for the next fiscal quarter for adjustment.

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 pooled investment securities including, but not limited to; open and closed-end mutual funds, Exchange-Traded products, limited partnerships, etc. The fees from these entities will include, but are not limited to; a management fee, other fund expenses, a possible distribution fee, and early redemption fees.

In addition to The Company's 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; Custodial fees, account fees, administration fees, IRA fees, check issuance fees, wire transaction fees, checking account fees, 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.

The Company will impose its own in-advance, non-refundable, annual processing fee of \$500.00 for non-electronic delivery of documents and/or performance reports if a client does not have the ability to receive documents from The Company or communicate in an electronic form.

The fee will be billed on the annual contract date.

In extremely rare circumstances, The Company may agree to waive this requirement.

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 of The Company's Preferred Custodians that it utilizes.

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 Sub-Advisor will only execute investment transactions based on written instructions provided by the client. Electronic communications will not suffice except by facsimile transmission.

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 with The Company's preferred custodians from either a service or pricing standpoint.

Conflict Of Interest:

The Company receives, at no cost, research products and services from mutual fund and/or Exchange-Traded Product companies. These companies provide research products and services to advisory firms and/or advisors in the hope that they may recommend their products to advisory clients. The Company has no obligation to these mutual fund companies to recommend their products. The Company will only recommend these products when consistent with its 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:

Sub-Advisory Fee:

The Company has engaged Legend to directly manage all their clients' portfolios as the Sub-Advisor. The Company will compensate the Sub-Advisor for its role as Sub-Advisor. 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 and/or consulted upon securities.

The Company does not charge Performance-Based Fees.

The Company does not offer Side-By-Side Management services.

TYPES OF CLIENTS

Description:

The Company provides investment management services to individuals, retirement plans, trusts, estates, non-profit organizations, businesses, medical practices, and registered investment advisory firms.

Client relationships vary in scope and length of service.

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 Financial Advisors, Inc.[®], (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 Sub-Advisor 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 Sub-Advisor’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 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 United States dollar today will not buy as much as a United States 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 United States 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 ever 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 ever 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 ever 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:

Wealth Advisor Publishing, Inc. which provides educational information to the financial advisory industry and the public as a publisher is 100.0% owned by the majority owner of The Company and its sister company, Legend Financial Advisors, Inc.[®]. Wealth Advisor Publishing, Inc. shares office space with The Company and Legend Financial Advisors, Inc.[®].

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 EmergingWealth 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 is 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/or 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 a The Company and/or Subadvisor blackout period.

If trading Exchange-Traded Funds, Exchange-Traded Notes or individual securities, those trades can affect 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, The Company reserves the right to terminate its contract with the client if the custodian that the client chooses does not offer services competitive with The Company's Preferred Custodians.

BROKERAGE PRACTICES

Selecting Brokerage Firms:

All investment management and investment consulting clients are free to select any broker-dealer of his or her choice. The Company is not affiliated with any of the Brokerage Firms. The Brokers do not supervise The Company, its Advisors, or activities.

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, and

Shareholders Service Group/Pershing, all are FINRA member broker-dealers unaffiliated with The Company and/or its Sub-Advisor. 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 neither The Company nor the Sub-Advisor, 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 Sub-Advisor. 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 Sub-Advisor, 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 Sub-Advisor 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 will send a letter to the trade desk advising of the trade error. The trade will be reversed and the client will be made whole. When the reversal trade 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 ACCOUNTS

Discretionary Investment Management And Discretionary Investment Management Consulting:

Periodic Reviews:

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 members of the Subadvisory firm's Investment Committee.

Portfolios, other than normal reviews, 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, but not limited to; technical indicators, interest rate fluctuations, tax circumstances, client circumstances and/or upon client request.

Performance Reports:

In addition to the monthly statements and confirmations of transactions a client receives from their custodian, The Company or the Custodian will offer electronic performance reporting.

CLIENT REFERRALS AND OTHER COMPENSATION

Client Referrals To The Company:

The Company does not directly or indirectly compensate any person for client referrals at the present time. However, the client reserves the right to pay referral fees to a solicitor under a solicitor's arrangement.

The Company will also periodically receive referrals of potential clients from other professionals such as CPAs, attorneys, etc. as well as existing clients. The Company does not share any fees in this type of arrangement.

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 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 that is paid to The Company by the client will be the same as the fee that would have been paid had the client contracted with The Company.

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 in electronic form at least quarterly. Upon receipt of statements directly from the custodian, the client is responsible for careful review of all documents for errors. The Company is not affiliated with any Custodian. The Custodians do not supervise The Company, its Advisors, or Activities.

INVESTMENT DISCRETION

Discretionary Authority for Trading:

The client delegates all discretionary authority for trading and all its powers regarding the investment assets to The Company and/or its Sub-Advisor. The client appoints The Company and/or its Sub-Advisor 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 solicitation.

Regarding voting proxies for a qualified retirement plan, an exception can occur.

FINANCIAL INFORMATION

Prepayment Of Fees:

The Company may require prepayment of fees for its Discretionary Investment Management Consulting Services nor does it require prepayment of fees of more than \$1,200.00 and six (6) months or more in advance. The Company is not required to provide an audited balance sheet to clients.

Bankruptcy:

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

SUPPLEMENT TO PART 2A FORM ADV (PART 2B OF FORM ADV):

The Securities and Exchange Commission (SEC) requires this regulatory disclosure document to be called a “Brochure”.

Education and Business Standards:

The Company requires that persons in an advisory function within the firm possess, at a minimum, the following qualifications: College level of education or corresponding years of service and experience in the financial industry in conjunction with standards for advice established and maintained by The Company as well as continual training to maintain the quality of recommendations, advice, and services provided to clients. In addition, persons in an advisory capacity within the firm must receive either the Certified Financial Planner (CFP®) designation or the Chartered Financial Analyst (CFA®) designation within eight years of starting to provide advice on The Company's behalf. Once a professional designation is obtained, each individual must meet all requirements to maintain their professional designation including, but not limited to, each year's minimum education requirements as set forth by any governing body.

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 include:

1. Bachelor's degree from an accredited college or university.
2. Completion of the financial planning education requirements established by the CFP® Board (www.cfp.net).
3. Successful completion of the CFP® Certification Exam.
4. Three-year qualifying full-time work experience.
5. 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 include:

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

2. Successful completion of all three exam levels of the CFA® Program.
3. Have 48 months of acceptable professional work experience in the investment decision-making process.
4. Fulfill society requirements, which vary by society. Unless upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by sponsors.
5. 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 interim, have not met their continuing professional education requirements. CPA® certification requirements include:

1. Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
2. Successful completion of the Uniform Certified Public Accountant Examination.

Professional Plan Consultant (PPC™):

The Professional Plan Consultant (PPC™) designation signifies a commitment to education and service excellence in the qualified plan industry. The 401(k) Service Training Program™ 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. PPC™ certification requirements include:

1. A successful candidate must have three years of financial industry sales, service, and/or support experience.
2. Successful completion of the 401(k) Service Training Program™ includes sitting for a 50-question, multiple choice examination and obtain a passing score of 80.0%.
3. A PPC™ 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.

4. On an ongoing basis, over a 12-month cycle, each PPC™ designee must complete six (6) continuing education hours in a format allowed by Financial Support Solutions.

Certified Divorce Financial Analyst (CDFA®):

In order to be considered for the Certified Divorce Financial Analyst designation, a CDFA® candidate is required to have at least two years experience in the financial or legal industry. CDFA® certification requirements include:

1. A CDFA® candidate must complete a series of four examinations based upon material learned from four self-study courses. Candidates must obtain a passing score of 70.0% on all exams.
2. Coursework includes key areas important in divorce proceedings; including the treatment of property during divorce, alimony and child support, and tax implications of property division.
3. The designation must be obtained with a one year timeframe.
4. Upon successful completion of all testing requirements, a candidate must have three years of financial industry sales, service, and/or support experience.
5. On an ongoing basis, over a 24-month cycle, each CDFA™ designee must complete a minimum number of fifteen (15) continuing education credit hours.

Accredited Wealth Management AdvisorSM (AWMA®):

This designation will provide the candidate with advanced as well as practical knowledge about critical aspects of the financial advisory industry including: asset management, investment allocation and selection; investment performance and strategies; in addition to 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. Furthermore, instruction will cover insurance, estate planning, asset protection and income tax reduction issues. AWMA® certification requirements include:

1. A candidate must obtain a passing score of 70.0% or higher
2. A candidate must comply with the Code of Ethics, by 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), a professional financial planning membership organization. NAPFA Registered Financial Advisor® requirements include:

1. Three years of financial planning experience, submit a sample financial plan and pass a peer review process
2. Possess a Bachelor's degree from an accredited institution
3. 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
4. Must also adhere to NAPFA's Fiduciary Oath, Standards of Membership and Affiliation, and Bylaws
5. Must obtain Continuing Education Requirements of sixty (60) hours every two (2) years
6. 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.

Firm Advisory Staff:

Louis P. Stanasolovich, CFP®

Date of birth: February 5, 1957

Educational Background:

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

Business Experience:

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

Disciplinary History: None

Other Business Activities:

100.0% Owner of Wealth Advisor Publishing, Inc.

Editor and Chief Operations Manager, President and CEO of Wealth Advisor Publishing, Inc.

Editor of *The Global Investment Pulse* Newsletter published by Legend Financial Advisors, Inc.® and EmergingWealth Investment Management, Inc.®

Additional Compensation From Other Business Activities: None

Supervision:

Louis P. Stanasolovich's compliance related activities, including personal securities trading (for himself and his family) 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.

Diane M. Pearson, CFP®, PPC™, CFDA®'s contact information:

(412) 635-9210

legend@legend-financial.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: 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.
- Wealth Advisor, EmergingWealth Investment Management, Inc.®, from October 2009 to Present.
- Shareholder of Legend Financial Advisors, Inc.® and EmergingWealth Investment Management, Inc.®

Disciplinary History: None

Other Business Activities:

Additional Compensation From Other Business Activities: None

Supervision:

Diane M. Pearson's compliance related activities, including personal securities trading (for herself and her family) are supervised by the Chief Compliance Officer. Ms. Pearson's work is reviewed through frequent office interactions as well as remote interactions.

Chief Compliance Officer contact information:

(412) 635-9210 legend@legend-financial.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None

James J. Holtzman, CFP®, CPA® Inactive

Date of birth: January 25, 1974

Educational Background:

- Bachelor of Science in Administration and Management, La Roche College, 1996.
- Bachelor of Science in 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.
- Wealth Advisor, EmergingWealth Investment Management, Inc.®, from October 2009 to Present.
- Shareholder of Legend Financial Advisors, Inc.® and EmergingWealth Investment Management, Inc.

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

James J. Holtzman's compliance related activities, including personal securities trading (for himself and his family) are supervised by the Chief Compliance Officer. Mr. Holtzman's work is reviewed through frequent office interactions as well as remote interactions.

Chief Compliance Officer contact information:

(412) 635-9210 legend@legend-financial.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None

Bradley M. Pendzick, AWMA®

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

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Bradley M. Pendzick's compliance related activities, including personal securities trading (for himself and his family) are supervised by the Chief Compliance Officer. Mr. Pendzick's work is reviewed through frequent office interactions as well as remote interactions.

Chief Compliance Officer contact information:

(412) 635-9210 legend@legend-financial.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None

Alex G. Hendrickson, AWMA®

Date of birth: May 14, 1993

Educational Background:

- Bachelor of Science in Finance, University of Pittsburgh, 2015.

Business Experience:

- Assistant Wealth Advisor, Legend Financial Advisors, Inc.® from June 2015. to Present
- Finance Intern, Legend Financial Advisors, Inc.® from December 2013 to June 2015.
- Investment Operations Coordinator, EmergingWealth Investment Management, Inc.®, from June 2015 to December 2016.

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Alex G. Hendrickson's compliance related activities, including personal securities trading are supervised by the Chief Compliance Officer. Mr. Hendrickson's work is reviewed through frequent office interactions as well as remote interactions.

Chief Compliance Officer contact information:

(412) 635-9210 legend@legend-financial.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None