

Firm Brochure

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Legend Financial Advisors, Inc.[®] If you have any questions about the contents of this brochure, please contact us at: (412) 635-9210, or by E-mail at: legend@legend-financial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC), or by any state securities authority.

Additional information about Legend Financial Advisors, Inc.[®] is available on the SEC's Website at www.adviserinfo.sec.gov.

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Material Changes

Annual Update

The Material Changes section of this brochure will be amended annually when material changes occur after the previous release.

Material Changes After The Last Amendment

8/28/2014 Updating Vince Strangio with PPC designation

11/23/2014 Removed Eric DeMico

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

12/04/2014 Updated Folio Institutional Fee Schedule

1/27/2015 Added the new Fee schedule for retirement plans

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

1/27/2015 Added Investment Research Analyst Fee

1/27/2015 Removed payment by Money Order

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

Full Brochure Available

Whenever you would like to receive a complete copy of Legend Financial Advisors, Inc.®'s Firm Brochure, please contact them by telephone at: (412) 635-9210 or by E-mail at: legend@legend-financial.com.

Advisory Business

Firm Description

Legend Financial Advisors, Inc.[®] ("The Company") is a Fee-Only U.S. Securities Exchange Commission registered investment advisory firm located in Pittsburgh, Pennsylvania. The Company was founded on July 23, 1993 and began accepting clients on January 10, 1994.

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; income tax planning; a review of relevant insurance coverages; investment management and/or consulting; education planning; retirement planning; estate planning and/or other potential services for which clients may retain The Company.

Portfolios and the underlying investments 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.

Principal Owners

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

Types of Advisory Services

Financial Planning

The Company offers Financial Planning services to individuals and families on an hourly basis at The Company's stated billing rates on a stand-alone basis. Usually, Financial Planning services are offered in conjunction with investment management or investment consulting services.

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

Financial Planning may include, but is not limited to: a net worth statement; an income tax projection; a cash flow projection; a review of insurance policies including; life insurance needs analysis; one or more retirement planning analyses; an estate planning review; an education planning analysis. Recommendations will be provided in all the above areas mentioned. Implementation of the recommendations is at the discretion of the client.

The client, at their option, may retain The Company on a year-to-year basis to assist them with changes in the client's personal, financial situation.

Hourly Planning Engagements

As stated above, The Company offers hourly planning services for clients who request advice on an as needed basis.

Investment Services

Investment Services include:

1. Discretionary Investment Management
2. Discretionary Investment Management Consulting
3. Investment Consulting Fixed Fee
4. Financial Planning and Discretionary Investment Management Consulting
5. Discretionary Subadvisory Investment Management
6. Discretionary Investment Management for Qualified and Non-Qualified Retirement Plans

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

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

Clients will retain individual ownership of all investments. Investment portfolios are managed only on a discretionary basis.

Discretionary Investment Management

The Company manages securities portfolios (each has its own strategy) on an ongoing discretionary basis. After an initial discussion about risk tolerance, goals and objectives, 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 will provide ongoing management of the investment assets at its sole discretion without first consulting the client. However, should client circumstances and/or wishes change after the initial recommendations are developed, the client will need to notify The Company. 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 may also 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 may be 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.

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

Discretionary Investment Management Consulting

This service is similar to the Discretionary Investment Management service, but may or may not involve unusual assets and/or accounts to manage. This service may include accounts and/or investments that are difficult to value except for once per year, or may be aggregated with accounts or with family member accounts that would normally be managed under a Discretionary Investment Management Agreement as stated below.

The Company manages securities portfolios (each has its own strategy) on an ongoing discretionary basis. After an initial discussion about risk tolerance, goals and objectives, 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 will provide ongoing management of the investment assets at its sole discretion without first consulting the client. However, should client circumstances and/or wishes change after the initial recommendations are developed, the client will need to notify The Company. 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 may also 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 may be 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.

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

Investment Consulting Fixed Fee

This service is offered when the client wishes The Company to consult upon investment assets that will not be managed. These assets may include accounts and/or investments that are difficult to manage and/or value except for once per year. In some situations The Company may only manage a portion of the investment assets on a discretionary basis.

For the portion of investment assets that are not managed, The Company will only consult. Should the client request assistance with changes to investment assets that are normally only consulted upon, where possible for an additional fee that is mutually agreed upon, The Company will assist with such changes.

When The Company manages securities portfolios (each has its own strategy) on an ongoing discretionary basis, it will do so as follows: After an initial discussion about risk tolerance, goals and objectives, 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 will provide ongoing management of the investment assets at its sole discretion without first consulting the client. However, should client circumstances and/or wishes change after the initial recommendations are developed, the client will need to notify The Company. 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 may also 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 may be 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.

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

Financial Planning And Discretionary Investment Management Or Consulting

Under this service, The Company combines either Discretionary Investment Management Consulting or Discretionary Investment Management with Financial Planning services. Please refer to the sections listed above for "Discretionary Investment Management Consulting", "Discretionary Investment Management" and "Financial Planning" sections. These combined services are available for a fixed fee that will generally not change during the initial period of the contract.

Discretionary Subadvisory Investment Management

The Company will act as a Subadvisor to other Advisors offering its Discretionary Investment Management Services. In other words, a client may engage an independent investment advisor (the "Advisor", which is not The Company) which, in turn, will engage The Company and perhaps other investment advisors to provide discretionary subadvisory investment management services to a portion or all of their client's portfolio(s).

Discretionary Investment Management for Qualified Retirement Plans

The Company manages qualified retirement plan investment assets under the Employment, Retirement and Income Security Act of 1974 (commonly known as ERISA). The Company will also review the Plan's Investment Policy Statement. Plan sponsors may hire an ERISA 3(38) investment manager to accept the fiduciary responsibility for the discretionary management of the investment options offered to plan participants. However, the plan sponsor can never delegate away its fiduciary responsibility for appointing the manager to carry out these duties.

The Company is willing to act as a Section 3(38) Investment Manager if so designated by the Plan Sponsor. If so designated, The Company would accept the following fiduciary responsibilities:

1. Select the investment options for the plan;
2. Construct portfolios to be offered to plan participants if requested by the plan sponsor;
3. Construct or designate Qualified Default Investment Alternatives ("QDIA") in accordance with U.S. Department of Labor ("DOL") guidelines which will be used as a default investment selection for participants who fail to make an affirmative investment election;
4. Monitor the investment options and portfolios on an ongoing discretionary basis and make changes when appropriate;
5. At least annually, provide the plan sponsor with an overview regarding the selection of the investment options offered to plan participants. The Company if requested by the plan sponsor to manage portfolios will provide information regarding the portfolios. This should enable the plan sponsor to fulfill its fiduciary responsibility regarding the sponsor's engagement of the manager.

The investment decisions for each plan participant's account are made by the plan participant.

If the Plan Sponsors and/or Trustees allow individual investment selections, participants can select from single and/or multiple open-end mutual funds.

Exchange-Traded products may be an additional/alternative investment option if permitted by the Plan Sponsor and/or Trustees and if they are offered by Third-Party Administrators and/or Custodians on their platforms.

The Plan Sponsor or Trustees may offer discretionarily managed portfolios that will usually include open-end mutual funds. These portfolios can also utilize Exchange-Traded products if the Plan Sponsor or Trustees desire them to be included and they are offered by Third-Party Administrators and/or Custodians on their platforms.

Individual securities such as stocks and other types of investments may also be used unless the Plan Sponsor or Trustees has otherwise restricted their usage.

Investment securities of all types 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; the track record of the investment; valuation of the investment or asset class as may be applicable, the manager; the investment manager's style and philosophy; and the investment manager's fee structure.

If a participant does not select an investment portfolio a Qualified Default Investment Alternatives ("QDIA") will be used as a default investment selection.

Individual investments, as well as discretionarily managed portfolios and the underlying investments are reviewed at The Company's discretion depending upon, but not limited to, the Plan's circumstances, cash inflows and outflows, and political and economic conditions as well as investment and financial market conditions and movements, to make the appropriate changes.

Discretionary Investment Management– Other Pooled Retirement Plans (Defined Contribution Profit-Sharing, Defined Benefit and Non-Qualified Deferred Compensation Plans)

The Company will meet with the trustees to determine the investment needs and goals. The Company will also review the Plan's Investment Policy Statement. If the plan does not have an Investment Policy Statement, The Company will assist the trustees in formulating one. In this event, The Company will discuss with the trustees issues such as risk tolerance, goals and objectives. Following the criteria for selection of investment vehicles and the procedures and timing interval for monitoring of investment performance, The Company will then prepare an investment strategy which incorporates this information.

The recommended investment strategy will incorporate a portfolio of investments appropriate for the plan's circumstances. Thereafter, The Company will provide ongoing management of the investment assets at its sole discretion without first consulting the trustees.

However, should the plan's circumstances and/or the trustees' wishes change after the initial recommendations are developed, the trustees will need to notify The Company. The Company will then consult with the trustees to develop a new investment strategy or modify the existing investment strategy.

With regard to the implementation of the investment strategy, portfolio weightings within a portfolio of investment positions, sectors, types of securities, etc. will be determined by The Company. Portfolios are managed only on a discretionary basis.

Most portfolios can include open-end and closed-end mutual funds and Exchange-Traded products, but some portfolios may also include individual securities such as 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 may be 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.

Upon mutual agreement with the trustees regarding the recommended investment strategy, a portfolio will be implemented.

The retirement plan will retain individual ownership of all investments.

Discretionary Investment Consulting – Other Pooled Retirement Plans (Defined Contribution Profit-Sharing, Defined Benefit and Non-Qualified Deferred Compensation Plans)

The Company can provide ongoing consulting regarding the plan itself, investment strategy formulation and/or the selection of the investment assets as well as portfolio managers.

The Company will meet with the trustees to determine the investment needs and goals. The Company will also review the Plan's Investment Policy Statement. If the plan does not have an Investment Policy Statement, The Company will assist the trustees in formulating one. In this event, The Company will discuss with the trustees issues such as risk tolerance, goals and objectives. Following the criteria for selection of investment vehicles and the procedures and timing interval for monitoring of investment performance, The Company will then prepare an investment strategy which incorporates this information.

However, should the plan's circumstances and/or the trustees' wishes change after the initial recommendations are developed, the trustees will need to notify The Company. The Company will then consult with the trustees to develop a new investment strategy or modify the existing investment strategy.

The recommended investment strategy will incorporate a portfolio of investments appropriate for the plan's circumstances.

With regard to the implementation of the investment strategy, portfolio weightings within a portfolio of investment positions, sectors, types of securities, etc. will be determined by any outside portfolio manager.

Most portfolios can include open-end and closed-end mutual funds and Exchange-Traded products, but some portfolios may also include individual securities such as 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 may be 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.

Upon mutual agreement between the outside portfolio manager and the trustees regarding the recommended investment strategy, the investment portfolio will be implemented.

The retirement plan will retain individual ownership of all investments.

Thereafter, The Company, upon being retained by the plan trustees, can provide ongoing consulting regarding the plan itself, investment strategy formulation and/or the selection of the investment assets as well as portfolio managers.

Expert Testimony

Certain principal executive officers and/or other employees of The Company may, in their capacity as officer or employee, provide expert legal testimony to assist attorneys in connection with advisory or securities-industry related litigation, arbitration proceedings or otherwise. The Company's expert testimony service will typically involve a recounting or verification of the standards for regulatory compliance and/or industry best-practices with respect to fiduciary responsibilities, fraud, suitability, compliance policies, procedures, codes of ethics and more.

Client Imposed Restrictions

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

Wrap Fee Programs

The Company does not participate in any wrap fee programs.

Client Assets

As of December 31, 2014, The Company manages on a Discretionary basis approximately \$280,219,123 in assets for 234 clients. The Company manages investments on a non-discretionary basis of approximately \$3,892,340 in assets for 3 clients. All of the assets are managed on a discretionary basis, except where Fixed Fee Consulting is applicable.

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.

The Company, in their sole discretion, may waive their minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical

relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, accounts owned by relatives of the client and/or businesses related to the client, account composition, negotiations with clients, etc.).

The Company may discount the listed advisory fees up to 30.0% to law, insurance, accounting and other types of professional 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 subject to applicable minimum fees 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 30.0% discount to non-profit organizations.

Financial Planning Fees

The Company will charge all of the staff members' applicable hourly fees (as described in the "Other Advisory Fees" section) in arrears on a monthly basis to the client.

Clients that had engaged The Company to provide Discretionary Investment Management Services to an account totaling \$1,500,000.00 or more prior to September, 2001 received the financial planning service at no additional cost. As agreed between The Company and the client, the client may continue to have their financial plan updated as needed without additional charges so long as the client's managed portfolio(s) with The Company exceed a total of \$1,500,000.00. This arrangement is no longer offered, except to grandfathered clients.

Some clients who have retained The Company for financial planning services separately in the past will be billed on a retainer basis in advance. The fee, which will be mutually agreed upon annually, will be billed semi-annually. This does not apply to hourly retainer clients.

The payment of the fee for such services shall be payable by check to "Legend Financial Advisors, Inc.®" or may be billed directly from the client's investment accounts.

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

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

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

Hourly Financial Planning Engagement Fees

The billing rate for Hourly Financial Planning for staff time is listed below:

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

The payment of the fee for such services shall be payable by check to "Legend Financial Advisors, Inc.®" or may be billed directly from the client's investment accounts.

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.

Discretionary Investment Management Fee Schedule (For Clients Who Custody at TD Ameritrade Institutional, Schwab Institutional or Shareholders Services Group/Pershing,LLC)

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

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

The minimum fiscal quarterly advisory fee for investment management is \$2,187.50. A client may have multiple portfolios to achieve the fiscal quarterly minimum advisory fee subject to a minimum securities value for each portfolio of \$250,000.00.

As of September 1, 1994, Discretionary Investment Management fees will be billed in arrears; however, clients who have previously arranged to have their fees billed in advance will continue that arrangement.

The above minimum fees and portfolio sizes may prevent The Company from providing services to clients that cannot achieve these minimums. However, The Company may waive the minimum fee to existing clients under unusual circumstances. If a prospective client's portfolio size does not meet the minimum, they may be referred to The Company's sister firm, EmergingWealth Investment Management, Inc.

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

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

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

Discretionary Investment Management Fee Schedule for Clients that Custody at Folio Institutional (Folio)

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

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

- c. 0.1125% on the amount in excess of \$2,000,000.00.

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

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

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

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

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

Discretionary Investment Management Consulting Fee Arrangements

The fee is normally recalculated once annually. The fee schedule for this service roughly follows the one for the Discretionary Investment Management service, but takes into consideration more complex assets to manage and/or value or are held at Custodians that do not offer electronic downloads and, therefore; results in more staff time than assets held at The Company's preferred Custodians. The Company may not have discretionary authority over the more complex assets held at other Custodians. In this situation, The Company will advise the client as to how these assets are to be positioned. Each client's fee is determined once annually on or prior to the anniversary date. The fee is then split into four equal fiscal quarterly payments.

If the client's asset level increases or decreases by 20.00% or more, the fee will automatically be reviewed the next fiscal quarter for possible adjustment. The new quarterly fee will remain in effect until the next anniversary date.

The total minimum fiscal quarterly fee is \$2,187.50. However, The Company may waive the minimum fee to existing clients under unusual circumstances. If a prospective client's portfolio size does not meet the minimum, they may be referred to The Company's sister firm, EmergingWealth Investment Management, Inc.

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, 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. At The Company's discretion, and only in unusual circumstances, the initial payment only may be payable by check to "Legend Financial Advisors, Inc.®." The client authorizes, in all other cases, 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. The client also authorizes The Company, under its discretionary authority, to liquidate positions held at The Company's preferred Custodians in the portfolio in order to provide sufficient funds for fee payment. The Company, in special circumstances, may elect to bill the client directly.

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

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

Investment Consulting Fixed Fee

This service is for clients who have the majority of their assets held at Custodians other than The Company's preferred Custodians. The minimum fee for this service is \$10,000.00, but billed in fiscal quarterly payments in advance. The fee will be reviewed annually and mutually agreed upon. For investment positions held at The Company's preferred Custodians, the client also authorizes The Company, under its discretionary authority, to liquidate positions in portfolio(s) that are managed by The Company directly, if applicable, in order to provide sufficient funds for fee payment. The Company, in special circumstances, may elect to bill the client directly.

If the client's asset level increases or decreases by 20.00% or more, the fee will automatically be reviewed the next fiscal quarter for possible adjustment. The new quarterly fee will remain in effect until the next anniversary date.

The fee to be paid by the client to The Company is payable as follows: The fee shall be billed on a fiscal quarterly basis, the first of which is due upon the execution of the contract, 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 initial payment only shall be payable by check to "Legend Financial Advisors, Inc.®" unless the client directs The Company to deduct the initial payment from the client's designated account(s) held at The Company's preferred Custodians. The client also authorizes The Company, under its discretionary authority, to liquidate positions held at The Company's preferred Custodians in the

portfolio in order to provide sufficient funds for fee payment. The Company, in special circumstances, may elect to bill the client directly.

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

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

Financial Planning and Discretionary Investment Management Consulting Fee

The fee is determined after a thorough analysis of the client's financial circumstances, complexity, investment monies to be managed and estimated hourly costs of Financial Planning and outside consulting on investments by The Company's staff. The fee will be reviewed at the end of the initial contract period and annually thereafter.

The total minimum fiscal quarterly fee is \$2,500.00.

The fee to be paid by the client to The Company is payable as follows: The fee shall be billed on a fiscal quarterly basis, the first of which is due upon the execution of the contract, 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 initial payment only shall be payable by check to "Legend Financial Advisors, Inc.®" unless the client directs The Company to deduct the initial payment from the client's designated account(s) held at The Company's preferred Custodians. The client also authorizes The Company, under its discretionary authority, to liquidate positions held at The Company's preferred Custodians in the portfolio in order to provide sufficient funds for fee payment. The Company, in special circumstances, may elect to bill the client directly.

If the client's asset level increases or decreases by 20.00% or more, the fee will automatically be reviewed the next fiscal quarter for possible adjustment. The new quarterly fee will remain in effect until the next anniversary date.

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.

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

Discretionary Subadvisory Investment Management Services Fee

The Company will provide Investment Management Services as a “Subadvisor” to Advisors that contract with The Company to do so. The Advisor will pay in fiscal quarterly payments to The Company an annual fee of 0.25% to 0.75%. The actual percentage charged to the Advisor will be based on the size and complexity of the Advisor’s portfolio(s) to be managed.

The client of the Advisor should refer to the Advisor’s disclosure documents for full information on the Advisor’s advisory services and fees. The Subadvisor (The Company) will generally bill the Advisor within thirty (30) days of the end of the billing cycle for the Advisor’s fees.

An Advisor may terminate their entire relationship with The Company at any time and will pay a prorata portion of any earned fees to The Company. These fees will be due and payable within thirty (30) days of termination.

The Advisor’s clients individually may also terminate their portfolio management services with the Advisor, which would, in turn, terminate the service that The Company offers. In which case, the Advisor will pay The Company a prorata portion of any of its earned fees. All of The Company’s fees will be due and payable within thirty (30) days of termination.

In addition, The Company may terminate their relationship at any time and will be owed any earned fees on a prorata basis. All of The Company’s fees will be due and payable within thirty (30) days of termination.

Discretionary Investment Management for Qualified Retirement Plans Fee Schedule

A separate fee schedule for this service is available to sponsors of qualified retirement plans who use a third party administrative firm not affiliated with The Company. Those Administrators and Actuaries will assess their own fee schedule.

The Company's quarterly fee schedule for these plans is:

- a. 0.50% of the first \$3,000,000.00;
- b. 0.40% on the next \$2,000,000.00;
- c. 0.30% on the next \$2,500,000.00;
- d. 0.25% on the next \$2,500,000.00.
- e. 0.20% on assets over \$10,000,000.00

The minimum qualified retirement plan asset amount that The Company will accept is \$1,000,000.00. However, The Company reserves the right to waive the minimum asset amount under certain circumstances.

The plan is invoiced quarterly for the fees due and are normally billed directly from the plan's investment accounts. In unique circumstances, the payment can be billed directly to the plan sponsor. In this situation, all checks should be payable to "Legend Financial Advisors, Inc.®".

The plan trustee(s) may terminate the relationship at any time and receive a prorata refund of any unearned fee, if fees are paid in advance, if applicable. Similarly, any earned, unpaid fees will be due and payable upon termination.

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

Expert Testimony

Certain principal executive officers and/or other employees of The Company may, in their capacity as officer or employee, provide expert legal testimony to assist attorneys in connection with advisory or securities-industry related litigation, arbitration proceedings or otherwise. The expert testimony service will typically involve a recounting or verification of the standards for regulatory compliance and/or industry best-practices with respect to fiduciary responsibilities, fraud, suitability, compliance policies, procedures, codes of ethics and more. The Company charges an hourly fee of \$500.00 for this service for principal time and staff time is charged at their normal hourly rates (as described in the section "Other Advisory Fees") and requires a minimum fee of \$50,000.00 depending upon the nature and complexity of the issues. A retainer of \$25,000.00 is required for this service before any work is performed. However, advance payment will never exceed \$500.00 for work that will not be completed within six (6) months. This fee may be negotiable in certain circumstances. The payment of the fee for such services shall be payable by check or money order to "Legend Financial Advisors, Inc.®".

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 days period. An additional 1.00% late fee, subject to the minimum described above, will be charged 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 partnership units, managed futures, limited partnerships, etc. The fees from these entities will include, but are not limited to; a management fee, other fund expenses, 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; any transaction charges, fees for duplicate and/or paper quarterly or monthly statements as well as electronic and/or paper transaction confirmation statements, and fees for electronic data feeds and reports. Termination fees may also apply to the liquidation and/or transfer of any account, including, but not limited to, retirement and non-retirement accounts.

In certain circumstances, electronic delivery may not be available.

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

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

The Company may impose a fee for providing maintenance to a non-managed account held at one or more of the 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 for facsimile transmissions (with a hard copy provided to The Company). All parties of any of The Company's agreements must sign a Termination Schedule (Schedule T) that The Company will provide upon either party's desire to terminate the relationship.

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 will only execute investment transactions based on written instructions provided by the client. Electronic communications will not suffice except for facsimile transmissions (with a hard copy provided to The Company).

Securities/Investment Products Compensation

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

Not Affiliated/Agent

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

Conflict Of Interest

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

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

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 use a performance-based fee structure.

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. The Company also provides personal financial

planning services to individuals. In addition, The Company offers medical practice and business financial planning services to those clients who request such services.

Client relationships vary in scope and length of service.

Portfolio Minimums

Any portfolio must have a minimum portfolio value of \$250,000.00 of either monies and/or securities. However, The Company does require minimum fees per client relationship as stated elsewhere in this document and therefore, a client may have multiple portfolios to attain that client relationship minimum fee.

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

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Proprietary portfolios have been developed and are maintained by The Company. Portfolio allocations are actively managed in the interest of targeting specific levels of risk and/or long-term returns. The active management of the portfolios is performed on a holistic basis. Prior to portfolio changes, due diligence and analysis on each component of a portfolio is conducted to determine the viability within a particular type of portfolio. New types of portfolios are periodically constructed while other portfolios may be terminated as a result of changes in the investment environment. Not every client will necessarily be affected by this construction and/or termination process.

General investment and/or individual security research typically includes, but is not limited to; fundamental, quantitative, macroeconomic, technical, and qualitative analysis.

The typical sources of information include all filings with the Securities and Exchange Commission, financial statements, company press releases, financial periodicals, internally-developed and external research materials and software, third-party security analysis reports, and discussions with fund management.

The predominant tools for investment analysis include, but are not limited to; dozens of periodicals, Morningstar Advisor Workstation, www.morningstar.com, Bloomberg Professional, third-party equity research reports, and internally developed research and analytics as well as information from any potential investment.

Investment Strategies

The Company has developed a range of portfolios to address various risk tolerance levels and performance expectations. The portfolio or combination of

portfolios, executed for each specific client is based upon the answers provided when discussing their Risk Tolerance, as well as any additional objectives stated by the client during consultations. When implementing a portfolio for a client, due to investment asset minimum requirements, the client's portfolio may be restricted from being as diversified as a similar client with more assets. Periodically, in order to qualify for some investments, Securities and Exchange Commission investor minimum investment net worth and/or income guidelines must be met. These investments are only offered to accredited or super accredited investors.

The Company employs strategic asset allocation strategies with an emphasis on the mitigation of risk (volatility) for all but the most aggressive (high risk) portfolios. These more conservative and moderate-to upper moderate-risk portfolios were developed and are maintained with the overarching principle of limiting participation in the volatile swings exhibited by the equity markets. **THERE IS NO GUARANTEE THAT THIS OBJECTIVE WILL BE ATTAINED.**

For the above-type portfolios, investments/securities are selected not only on their respective merits, but in some cases depend somewhat on each investment's/security's impact on the risk/reward profile of the entire portfolio as well as The Company's ability to minimize risk when it is rising in a substantial way. The objective is to achieve long-term returns that are smoother over time. **THERE IS NO GUARANTEE THAT THIS OBJECTIVE WILL BE ATTAINED.**

Most portfolios, other than the most aggressive ones, will predominantly invest in open-end managed mutual funds as well as Exchange-Traded Funds and Exchange-Traded Notes. Limited partnership units, hedge funds, and fixed income individual securities may occasionally be used, but to a lesser degree.

Aggressive (high risk) portfolios have been developed and are maintained for clients with a high risk tolerance and long-term time horizons for invested assets. Such portfolios are managed with the primary goal of enhancing returns with less emphasis on limiting volatility. **THERE IS NO GUARANTEE THAT THIS OBJECTIVE WILL BE ATTAINED.**

Investments/securities for aggressive (high risk) portfolios are generally selected on a tactical and/or opportunistic basis given current macroeconomic and market conditions. The aggressive (high risk) portfolios will typically invest in the following securities; individual stocks, Exchange-Traded products, open-end mutual funds and closed-end mutual funds. Occasionally, Limited Partnerships and hedge funds may be used, but to a significantly lesser degree.

Risk of Loss

The Company 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 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, especially for fixed income securities, 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 stock, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
3. Inflation or Deflation Risk: When any type of inflation is present, a Dollar today will not buy as much as a Dollar in the future, because purchasing power is eroding at the rate of inflation. Deflation has the opposite effect.
4. Currency Risk: Overseas investments are subject to fluctuations in the value of the Dollar against the currency of the investment's originating country. This is also referred to as Exchange Rate Risk.
5. Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
6. Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity regardless of the economic environment.
7. Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
8. Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because that business must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
9. Political Risk: Government policy may adversely affect securities prices. While domestic policy may have an impact on domestic securities, the risk is more pronounced for international investing. International investing involves additional risks including, but not limited to, currency fluctuations, political or

economic conditions affecting the foreign country and differences in accounting standards and foreign regulations.

Disciplinary Information

Criminal Or Civil Action

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

Administrative Proceeding Before The SEC Or Any Other Regulatory Agencies

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

Self-Regulatory Organization Violations

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

Other Financial Industry Activities And Affiliations

Broker-Dealer Affiliations

The Company and its employees are not registered nor do they 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

In addition to acting as an investment advisor, The Company also publishes a client newsletter addressing general issues about investing and other related topics. This newsletter provides no specific recommendations to clients, and does not address the investment needs of any particular client. It is anticipated that The Company employees and its principal executive officer will spend less than 10.00% of their time on this activity.

Related Persons

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

Other Investment Advisors

The Company provides subadvisory services to a SEC registered investment advisor, EmergingWealth Investment Management, Inc., (SEC File No. 801-70731). Both firms, The Company and EmergingWealth, have common ownership, share research, common employees and office space.

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 The Company. They share common research, employees and office space. Wealth Advisor Publishing, Inc. shares office space with The Company and EmergingWealth. The Company's employees contribute services to Wealth Advisor Publishing, Inc. Wealth Advisor Publishing, Inc. is 100.0% owned by the majority owner of The Company and EmergingWealth.

The staff of The Company performs services relating to the investment management business of EmergingWealth. The Company is reimbursed for the use of its staff members.

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

Code of Ethics, Participation Or Interest In Client Transactions And Personal Trading

Code of Ethics

The Company has adopted a Code of Ethics which sets forth high ethical standards of business conduct that The Company requires of its employees, including compliance with applicable federal securities laws. The Company's Code of Ethics also includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by The Company's employees. Among other things, the Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. The Code of Ethics also includes oversight, enforcement and recordkeeping provisions. A copy of the Code of Ethics is offered annually to The Company's advisory clients or prospective clients or a copy can be furnished upon request.

Participation or Interest in Client Transactions

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

Personal Trading

The Company's policy allows employees to maintain personal securities accounts provided any personal investing by an employee in any accounts in which the employee has a beneficial interest, including any accounts for any immediate family or household members, is consistent with The Company's fiduciary duty to the 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 and/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 blackout period.

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

The Company may maintain a corporate securities account(s). The trading reviews are performed by the Chief Compliance Officer to ensure corporate trading does not affect the market and to ensure that clients receive preferential treatment.

Brokerage Practices

Selecting Broker-Dealers/Custodians

All investment management, investment consulting, or subadvisory clients are free to select any Broker-Dealer/Custodian of his or her choice. However, The Company reserves the right to terminate its contract with the client if the Broker-Dealer/Custodian that the client chooses does not offer services competitive with The Company's preferred Broker-Dealers/Custodians.

For investment management, investment consulting, or subadvisory clients in need of brokerage or custodial services, and depending on client circumstances and needs, we may recommend the use of one of several broker-dealers including but not limited to; TD Ameritrade, Inc., Charles Schwab & Company, Inc. and Folio Institutional, all are FINRA member broker-dealers unaffiliated with The Company. The recommendation of these firms is consistent with The Company's 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, The Company's experience with the broker-dealer, reputation, and quality of execution services and costs of such services, among other factors. In evaluating The Company's recommendation, clients should note that The Company participates in the TD Ameritrade Institutional Program (hereinafter the "TDA Program") offered to independent investment advisors by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade, Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade

execution, clearance and settlement of transactions. The Company receives some benefits from TD Ameritrade through its participation in the TDA Program.

As disclosed above, The Company participates in TD Ameritrade's institutional client program and The Company may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between The Company's participation in the TDA Program and the investment advice it gives to its clients, although The Company receives economic benefits through its participation in the TDA Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving The Company participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to The Company by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by The Company's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit The Company, but may not benefit its client accounts. These products or services may assist The Company in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help The Company manage and further develop its business enterprise. The benefits received by The Company or its personnel through participation in the TDA Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, The Company endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefit by The Company or its related persons in and of itself creates a potential conflict of interest and may indirectly influence The Company's choice of TD Ameritrade for custody and brokerage services. As part of the TDA Program, The Company receives certain benefits that they would not receive if it did not offer investment advice to clients.

The Company also participates in the Charles Schwab & Company, Inc.'s SchwabLink program that is offered to independent investment advisors. SchwabLink is a proprietary data-exchange software. The Company receives this benefit based on the amount of assets that they have under management at Charles Schwab & Company, Inc.

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.

Research And Other Soft Dollars

In addition to a broker-dealer's ability to provide the "best execution" for their clients, The Company may consider the value of "research" or additional brokerage products and services that a broker-dealer has provided or may be willing to provide. This is known as paying for such services or products with "soft dollars". The Company is currently enrolled in the Soft Dollar Program provided by TD Ameritrade, Inc. Because many of the products or services could be considered to provide a benefit to The Company and, because the "soft dollars" used to acquire them are client assets, The Company could be considered to have a conflict of interest in allocating client brokerage business. As a result, The Company could receive valuable benefits by selecting TD Ameritrade, Inc. to execute client transactions and the transaction costs charged by TD Ameritrade, Inc. might not be the lowest transaction cost The Company might otherwise be able to negotiate or find elsewhere. In addition, The Company theoretically could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products or services.

The Company's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), The Company will make a good faith determination that the fees paid are reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker-dealer, The Company will generally determine, considering all of the factors described below, that the compensation paid to TD Ameritrade, Inc. is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade, Inc. In making this determination, The Company typically considers not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in The Company's performance of its overall responsibilities to all of its clients. In some cases, transaction fees charged by TD Ameritrade, Inc. for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge. In such cases, however, the products or services involved are used solely for the benefit of the client in whose account the fees are incurred.

Research and Brokerage Products and Services. "Research" products and services The Company may receive from TD Ameritrade, Inc. may include financial publications or other information about particular companies and industries (through research reports and otherwise); and other products or services (e.g., computer services, including software, and data bases) that provide lawful and appropriate assistance to the firm in the performance of its investment decision-making responsibilities. Consistent with Section 28(e), brokerage products and services

(beyond traditional execution services) consist primarily of computer services and software that permit The Company to effect securities transactions and perform functions incidental to transaction execution. The Company generally uses such products and services in the conduct of our investment decision-making, not just for those accounts whose fees may be considered to have been used to pay for the products or services.

Amount and Manner of Payment. TD Ameritrade, Inc. establishes soft dollar "credits" arising out of stock trading brokerage business done in the past, which may be used to pay for specified lawful and appropriate research expenses. The actual level of transactional business The Company does with TD Ameritrade, Inc. during any period may generate unused soft dollar "credits." The Company does not exclude a broker-dealer from receiving business simply because the broker-dealer has not been identified as providing soft dollar research products and services.

Brokerage For Client Referrals

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 Directed 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

Investment transactions of traded securities for each client generally will be effected independently, unless The Company decides to purchase or sell the same investments for several clients at approximately the same time. The Company may (but are not obligated to) combine or "batch" (also known as a "block trade") such orders to obtain best execution and/or to obtain more favorable commission rates as may be applicable. The Company will strive to allocate combined orders as equitably as possible among their clients' accounts. Under the batch procedure, transactions will be averaged as to price and will be allocated among their clients in proportion to the purchase and sale orders placed for each client at each respective custodian on any given day.

Trade Error Disclosure

TD Ameritrade Institutional: It is The Company's policy and practice to seek to identify and correct trade errors in client accounts without ultimately disadvantaging the client. Should The Company discover a trade error attributable to the action or inaction of The Company or its staff, it is The Company's policy to correct the error so as to place the client in at least the same economic position as the client would have been in had the error not occurred. These corrections typically take place in a "trade error account" maintained by The Company at TD Ameritrade Institutional. Certain errors, when corrected, will result in a profit. When a profitable trade

correction is identifiable to a client, the profit will be paid to that client. When a profitable trade cannot be identified to a client the profit will be donated to a charity of The Company's choice.

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

Schwab Institutional: The Company is to contact the trade desk to advise them of the error. The trade will be reversed and the client will be made whole. Schwab will sell off the security in which the error occurred. If the loss is less than \$100.00, Schwab will bear the loss. If the trade results in a loss greater than \$100.00, The Company will be invoiced for the loss. Where a gain results, the gain will be left in the client's account.

Review of Accounts

Periodic Reviews

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

Investment Consulting: Client portfolio(s) and other documentation will be reviewed as requested and as contracted at the inception of the advisory relationship.

Financial Planning: Clients receive an annual review of their financial planning situation. The review will be completed by a member of the advisory team.

Review Triggers

Portfolios and the financial plans are reviewed at The Company's discretion depending upon, but not limited to; client circumstances, cash inflows and outflows, 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.

Regular Reports

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

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

Investment Consulting: Clients will not typically receive reports due to the nature of the service.

Financial Planning: It is the goal of The Company to provide clients with an annual review of their financial plan where relevant. The only reason this would not be accomplished is that the client did not provide The Company with the requested information in a timely manner. If requested, for a separate fee, these reports may be provided more frequently.

Client Referrals and Other Compensation

Client Referrals To The Company

The Company may contract with other professionals to introduce The Company to that professional's clients. All such introductions by the other professionals will be made pursuant to Rule 206(4)-3 of the Investment Advisers Act of 1940 and applicable state laws and regulations. The Company will not contract with any client who is a resident of a state in which The Company does not have appropriate notice filed as an investment advisor, if such notice filing is required, otherwise known as Solicitor's Agreement.

The Company may share its advisory fee with any person who introduces The Company to a new client, provided that the payment of such fee is in compliance with Rule 206(4)-3 of the Advisers Act and applicable state laws.

As disclosed under Brokerage Practices-Selecting Brokerage Firms above, The Company participates in TD Ameritrade's institutional client program and The Company may recommend TD Ameritrade to clients for custody and brokerage services. There is not a direct link between The Company's participation in the program and the investment advice it gives to its clients, although The Company receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate statements and confirmations; research related products and tools; consulting services; access to a trading desk serving The Company participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management

products or services provided to The Company by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by The Company's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit The Company but may not benefit its client accounts. These products or services may assist The Company in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help The Company manage and further develop its business enterprise. The benefits received by The Company or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, The Company endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by The Company or its related persons in and of itself creates a potential conflict of interest and may indirectly influence The Company's choice of TD Ameritrade for custody and brokerage services.

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 the delivery to The Company of a signed and dated acknowledgment of receipt of the Solicitor's Firm Brochure, and The Company's Firm Brochure (Part 2A of Form ADV).

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 paid to The Company by such referred clients will be no different than the same as the fee that would have been charged had the referred client contracted with The Company themselves.

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.

iRebal Discounts

The Company considers a number of factors in selecting brokers and custodians at which to locate its client accounts, including, but not limited to; execution capability, experience and financial stability, reputation and the quality of services provided. In selecting TD Ameritrade Institutional (TD Ameritrade) as the broker and custodian for certain current and future client accounts, The Company takes into consideration its arrangement with TD Ameritrade as to obtaining TD Ameritrade's automatic portfolio rebalancing service for The Company, known as "iRebal". The Company receives this software at no cost as long as it maintains a certain minimum amount of taxable client accounts at TD Ameritrade.

The standard annual iRebal licensing fee that would otherwise be applicable is \$20,000.00. That fee is subject to specified reductions (and in The Company's case, a complete waiver) if specified amount of client's taxable accounts are either already on the TD Ameritrade Institutional platform or are committed to be placed on it. Specified taxable client accounts either maintained on or committed to the TD Ameritrade Institutional platform will bring fee reductions of up to \$20,000.00 per year for as many as three years or more.

The non-taxable accounts excluded from the maintenance and commitment levels described above are those that constitute "plan assets" of plans subject to Title 1 of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), or as defined in Section 4975 of the Internal Revenue Code (which includes IRAs).

If The Company does not maintain the relevant level of taxable assets on the TD Ameritrade Institutional platform, The Company may be required to make a penalty fee payment to TD Ameritrade calculated on the basis of the shortfall.

Although The Company believes that the products and services offered by TD Ameritrade are competitive in the market place for similar services offered by other broker-dealers or custodians, the arrangement with TD Ameritrade regarding the iRebal service may affect our independent judgment when selecting or maintaining TD Ameritrade as the broker or custodian for client accounts.

Custody

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

Investment Discretion

Discretionary Authority for Trading

The client delegates all discretionary authority for trading and all of its powers with regard to the investment assets to The Company. The client appoints The Company

as their “attorney and agent in fact” with full authority to buy, sell, or otherwise effect investment transactions on such investment assets on their behalf.

Voting Client Securities

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

The only time that The Company would vote any proxies for an investment would be for an ERISA type plan that the Plan Sponsor’s Board directed by the contract stating that The Company is to vote any proxies for the plan and in accordance to the Plan Sponsor’s proxy voting policy.

Financial Information

Prepayment Of Fees

A balance sheet is not required to be provided because The Company does not serve as a custodian for client funds or securities, and do not require prepayment of fees of more than \$500.00 per client, six (6) months or more in advance.

Bankruptcy

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

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

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

Professional Certifications

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

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

1. Bachelor's degree from an accredited college or university.
2. Completion of the financial planning education requirements set 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:

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 you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your 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 lapsed their continuing professional education.

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[™] is the only course that sets service standards in the retirement plan industry and imparts professionals not only with the knowledge, but the tools needed to meet (and exceed) those standards.

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[™]. Each candidate must sit for a 50-question, multiple choice examination held at the end of the training program, and obtain a passing score of 80.0% or better.
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 a minimum number of continuing education hours (6) in a format allowed by Financial Support Solutions.

Certified Divorce Financial Analyst (CDFA[™]): In order to be considered for the Certified Divorce Financial Analyst this designation, a professional must have at least two years experience in the financial or legal industry. (15 divorce-related, obtain continuing education credits every two years.)

1. To obtain this designation, a professional must complete a series of four examinations based upon material learned from four self-study courses. A candidate must obtain a passing score of 70.0% or higher on all exams.
2. Coursework outlines several key areas important in divorce proceedings; including the treatment of property during divorce, alimony and child support, and tax implications of property division.
3. The entire program must be completed with a one year timeframe.
4. A successful 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 continuing education hours (15) in a format allowed by Financial Support Solutions.

Accredited Wealth Management AdvisorSM (AWMA[®]): This designation will provide the candidate with advanced, yet practical knowledge about critical aspects of the financial services industry: asset management, allocation and selection; investment performance and strategies; and taxation of investment products. The course also includes training in investment for retirement, strategies for small business owners, and the management of deferred compensation plans. In addition, instruction will cover insurance, estate planning, asset protection and income tax reduction issues.

1. To obtain this designation, a professional must successfully complete the program;
2. Pass the final examination with a passing score of 70.0% or higher; and
3. Comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

NAPFA Registered Financial Advisor[®]: This designation is the top level of membership in the National Association of Personal Financial Advisors (NAPFA). All NAPFA-Registered Financial Advisors[®] must have three years of comprehensive financial planning experience, have a sample comprehensive financial plan pass a peer review process. All NAPFA-Registered Financial Advisors[®] must possess a Bachelor's degree from an accredited institution. Currently, new NAPFA-Registered Financial Advisors[®] must also possess either the Certified Financial PlanningTM designation awarded by the Certified Financial Planning Board of Standards, Inc., or

the American Institute of Certified Public Accountants' Personal Financial Specialist (CPA®/PFS) credential. All NAPFA-Registered Financial Advisors® must also adhere to NAPFA's Fiduciary Oath, Standards of Membership and Affiliation, and Bylaws. NAPFA-Registered Financial Advisors® must also comply with NAPFA's industry-leading strict continuing education requirements of sixty (60) hours every two (2) years. All NAPFA-Registered Financial Advisors® provide investment and/or financial advice on a strictly Fee-Only basis as defined by NAPFA, and continue to meet NAPFA's standards for strong character and adherence to the laws and regulation governing the profession.

Louis P. Stanasolovich, CFP®

Date of birth: February 5, 1957

Educational Background:

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

Business Experience:

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

Disciplinary History: None

Other Business Activities: Editor and Chief Operations Manager, October 1, 2012
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.

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

Additional Compensation: None

Supervision:

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

Diane M. Pearson, CFP®, PPC™, CFDA™'s contact information:
(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[™], CFA[™]

Date of birth: July 20, 1964

Educational Background:

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

Business Experience:

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

Disciplinary History: None

Other Business Activities:

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

Additional Compensation: None

Supervision:

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

Chief Compliance Officer contact information:

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

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

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

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, CFP, AWMA[®], Assistant Advisor

Date of birth: December 4, 1989

Educational Background:

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

Business Experience:

- Assistant Wealth Advisor, Legend Financial Advisors, Inc.[®] from May, 2012 to Present
- 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 are supervised by the Chief Compliance Officer. The Chief Compliance Officer reviews Mr. Pendzick's work through frequent office interactions as well as remote interactions. The Chief Compliance Officer also reviews Mr. Pendzick's activities through our client relationship management system.

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

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

Date of birth: September 23, 1969

Educational Background:

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

Business Experience:

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

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

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

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

Amber S. Makokele, Investment Operations Coordinator

Date of birth: March 1, 1989

Educational Background:

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

Business Experience:

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

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Amber S. Makokele's compliance related activities are supervised by the Chief Compliance Officer. The Chief Compliance Officer reviews Ms. Makokele's work through frequent office interactions as well as remote interactions. The Chief Compliance Officer also reviews Ms. Makokele's activities through our client relationship management system.

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