

FORM ADV**Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

OMB Number: 3235-0049
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Hours per response.....4.07

Name of Investment Adviser: Legacy Capital Group California						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
	459 Monterey Avenue	Los Gatos	CA	95030		408-399-6330

**This part of FORM ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any government authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.

Applicant: **Legacy Capital Group California**

SEC File Number:

801- **69566**

Date:

03-15-2010

1. A. Advisory Services and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- | | | |
|-------------------------------------|--|-------------|
| <input type="checkbox"/> | (1) Provides investment supervisory services | _____ % |
| <input type="checkbox"/> | (2) Manages investment advisory accounts not involving investment supervisory services..... | _____ % |
| <input checked="" type="checkbox"/> | (3) Furnishes investment advice through consultations not included in either service described above... | <u>50</u> % |
| <input type="checkbox"/> | (4) Issues periodicals about securities by subscription | _____ % |
| <input type="checkbox"/> | (5) Issues special reports about securities not included in any service described above..... | _____ % |
| <input type="checkbox"/> | (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... | _____ % |
| <input checked="" type="checkbox"/> | (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities... | <u>25</u> % |
| <input type="checkbox"/> | (8) Provides a timing service | _____ % |
| <input checked="" type="checkbox"/> | (9) Furnishes advice about securities in any manner not described above..... | <u>25</u> % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes ☒ No ☐

C. Applicant offers investment advisory services for: (check all that apply)

- | | | | |
|-------------------------------------|--|-------------------------------------|-----------------------|
| <input type="checkbox"/> | (1) A percentage of assets under management | <input type="checkbox"/> | (4) Subscription fees |
| <input checked="" type="checkbox"/> | (2) Hourly charges | <input type="checkbox"/> | (5) Commissions |
| <input checked="" type="checkbox"/> | (3) Fixed fees (not including subscription fees) | <input checked="" type="checkbox"/> | (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | | | |
|-------------------------------------|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | A. Individuals | <input checked="" type="checkbox"/> | E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> | B. Banks or thrift institutions | <input checked="" type="checkbox"/> | F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> | C. Investment companies | <input type="checkbox"/> | G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> | D. Pension and profit sharing plans | | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | <input checked="" type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> (1) securities |
| <input checked="" type="checkbox"/> (3) Foreign issuers | <input type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input checked="" type="checkbox"/> (1) real estate |
| <input checked="" type="checkbox"/> G. Investment company securities: | <input checked="" type="checkbox"/> (2) oil and gas interests |
| <input checked="" type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (2) variable annuities | <input checked="" type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission |
| (4) <input type="checkbox"/> Corporate rating services | (7) <input checked="" type="checkbox"/> Company press releases |
| | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Applicant: Legacy Capital Group California

SEC File Number:
801- 69566

Date:
03-15-2010

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
☒ ☐

(If yes, please describe these standards on Schedule F)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☒ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- ☐ C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input checked="" type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input checked="" type="checkbox"/> (3) other investment adviser | <input checked="" type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input checked="" type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.. Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

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9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sell for itself securities it also recommended to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes No
☐ ☒

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory account, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Richard E. Baer, Principal, Brent C. Bunger, Principal and Andrew Eakin, Planning Associate will be responsible for reviewing client accounts. Annual reviews will be made available to clients should they choose to have a review done either in person or via the phone. Letters will be mailed to clients at the end of each year reminding them of this service. At the request of the investor, or at any significant change in the amount of assets available for investment, the overall allocation and financial plan will be reviewed and discussed.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Clients with managed accounts will receive confirmations and monthly statements from the Broker-Dealer or Investment Company with which their accounts are held. In addition, clients will receive quarterly and annual statements from either the manager or the custodian. Clients who have insurance contracts will receive statements directly from the carrier. Clients who have contracted for fixed fee financial planning services will receive a written financial plan. Additional reports will be prepared at the request of clients.

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | | |
|--|--------------------------|-------------------------------------|
| | Yes | No |
| (1) securities to be bought or sold? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) amount of securities to be bought or sold? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (3) broker or dealer to be used? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) commission rates paid? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ☒ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|-------------------------------------|--------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes | No |
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes | No |
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?..... ☐ Yes ☒ No

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Legacy Capital Group California

SEC File Number:
801- 69566

Date:
03-15-2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Legacy Capital Group California

IRS Empl. Ident. No.:

94-2696159

Item of Form (identify)	Answer
Part II, Page 2 Item 1A (3, 7, 9)	<p>Legacy Capital Group California, ("LCG" or "Advisor"), will provide the following services to clients for the fees stated below:</p> <p style="text-align: center;"><u>Hourly Consultation Services:</u></p> <p>Hourly consultation services will include assistance to clients in designing personal financial planning goals and objectives, and recommendations as to the allocation of present financial resources among different types of assets. The fee for this service will not exceed \$250.00 per hour depending upon the qualification of the individual providing the service and the complexity of the service required. Hourly fees will be billed on a monthly basis, after services have been rendered.</p> <p style="text-align: center;"><u>Written Feasibility Studies:</u></p> <p>LCG provides written feasibility studies for the analysis and design component of its practice. These reports may include tax projection estimates prepared in-house or in conjunction with outside tax counsel. These reports may also include:</p> <ul style="list-style-type: none"> Financial Projections Cash Flow Estimates Tax Projection Estimates Portfolio Reallocations Strategies for Estate/Tax Planning Philanthropic Estate/Tax Planning Life Insurance Analysis and Recommendations Employee Stock Option Exercise and Tax Strategies Retirement Anticipation Planning <p>Compensation for the above-mentioned services is structured as:</p> <ol style="list-style-type: none"> 1. Fixed fee for services with 50% investment or commission offset. (This normally is \$10,000.00 as determined by involvement and complexity) and/or 2. Value-Added fee determined as a percentage of tax benefits received by client for the design and implementation of the written plan or feasibility study. Customarily the value added fee is 10% of the estimated income tax savings enjoyed by the client. When we work on very large estates our fee structure is often modified to reflect a greater level of complexity and the involvement of other financial advisors, attorneys and accountants. In these cases, our fee arrangement is broken into an initial \$10,000.00 fee to quantify the potential benefit to the client of our strategy. Often these clients are in other locales that require one or more members of the design team to fly to meetings. The \$10,000.00 fee is normally fully absorbed paying for expenses and is not a profit center in and of itself. 3. Once we have quantified the benefit and explained in general terms how we will accomplish the client's objectives, we quote a larger fee to implement. The implementation fee is divided into two parts. The second part can be offset by the purchase of investment or insurance products if appropriate. We then operate as team coordinators to make sure that the various parts of the plan are implemented. The services described above are available to high net worth individuals.

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Legacy Capital Group California

SEC File Number:
801- 69566

Date:
03-15-2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Legacy Capital Group California

IRS Empl. Ident. No.:

94-2696159

Item of Form
(identify)

Answer

Fees are paid as follows in a LCG only case:

1. Initial Deposit - This is usually half of the quoted fee. This is used to cover our production costs for the design of the plan. We often will utilize an accountant or an attorney to complete some part of our plan design. Sometimes the advisor agrees to provide us support without current charge but with the expectation that we will refer the client to him/her for implementation. Sometimes we pay for those services up front.
2. Second Payment - LCG normally will waive this fee should the client decide to use us for implementation. The offset may be agreed to in advance, and is at the sole discretion of LCG, pursuant to an agreement with the client.

Agreements to perform financial planning or other of the investment advisory services described above may be terminated by either party by providing written notice of the request to terminate the arrangement. Upon receipt of the notification, any unearned fees will be refunded.

LCG may receive a portion of fees that are independently collected and charged by money managers or other investment platforms.

Other Types of Investments

LCG continually reviews available investment products. On occasion, an alternative investment product may be recommended to investors once LCG has performed due diligence on the company offering the product and the product itself.

Education and Business Standards:

Advisory associates will be required to maintain the NASD Series 7 license and/or any appropriate state securities licenses and have extensive business related experience.

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Legacy Capital Group California

SEC File Number:
801- 69566

Date:
03-15-2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Legacy Capital Group California

IRS Empl. Ident. No.:

94-2696159

Item of Form (identify)	Answer
Part II, Page 4 Item 6	<p align="center"><u>Education and Business Background:</u></p> <p><u>Richard E. Baer, Principal, Chairman of the Board</u> Date of Birth: 11/28/1951 Education: San Jose State University, B.A., Political Science 1973 Employment for the Past Five Years: Legacy Capital Group California, 10/80 to present NFP Securities, Inc., Registered Representative, 6/97 to present</p> <p><u>Brent C. Bungler, Principal, President</u> Date of Birth: 3/26/1963 Education: University of Santa Clara, B.S. Political Science, 1985 Employment for the Past Five Years: Legacy Capital Group California, 12/92 to present NFP Securities, Inc., Registered Representative, 6/97 to present</p> <p><u>Andrew M. Baugh, Principal, CEO, CCO</u> Date of Birth: 3/11/1972 Education: Indiana University, B.S. Business, 1994 Employment for the Past Five Years: Legacy Capital Group California, 2/98 to present NFP Securities, Inc., Registered Principal, 12/98 to present</p> <p><u>Kim Lawson, COO</u> Date of Birth: 4/16/1970 Education: University of Santa Clara, B.S. Business Management, 1992 Employment for the Past Five Years: Legacy Capital Group California, 5/06 to present NFP Securities, Inc., Registered Representative, 6/06 to present Loring Ward Advisor Services (Assante Asset Management/RWB Advisory Services), 3/91 - 5/06</p> <p><u>Andrew G. Eakin, Planning Associate</u> Date of Birth: 9/24/1975 Education: Hamilton College, B.A., Public Policy 1998 Employment for the Past Five Years: Legacy Capital Group California, 12/05 to present NFP Securities, Inc., Registered Representative, 12/05 to present Northwestern Mutual Investment Services, Registered Representative, 12/02 to 11/05 Northwestern Mutual Life Insurance, Financial Representative, 12/02 to 11/05</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

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Legacy Capital Group California

SEC File Number:
801- 69566

Date:
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Legacy Capital Group California		IRS Empl. Ident. No.: 94-2696159
Item of Form (identify)	Answer	
Part II, Page 4 Item 7A, B, C	<p align="center"><u>Other Business Activities & affiliations:</u></p> <p>Richard E. Baer, Brent C. Bunger, and Andrew Eakin are registered representatives with NFP Securities, Inc., a registered broker-dealer and investment advisor. Clients are under no obligation to purchase variable products through Mr. Baer, Mr. Bunger, Mr. Eakin or NFP Securities, Inc.</p> <p>LCG is a 50% shareholder in The Legacy Group, LLC, which designs tax efficient plans to maximize the value of client estates, while responding to each client's personal philosophy. Legacy Capital Group Arkansas owns the other 50%.</p> <p>Baer & Bunger Financial & Insurance Services, LLC ("B&B") has been established to receive traditional life and disability insurance commissions. Legacy Capital Group California owns 98% of the LLC and Richard E. Baer and Brent C. Bunger each own 1% of the LLC.</p> <p>459 Monterey Avenue, LLC owns an office building and LCG occupies the first floor. The second floor is leased. 459 Monterey Avenue, LLC will receive rental income for the leased property. Richard and Therese Baer and Brent and Tanya Bunger and Andy Baugh own 459 Monterey Avenue, LLC.</p> <p>REACT Investment Solutions (REACT) is an SEC registered RIA that provides research on money managers and other investments, as well as back office solutions. Clients of REACT are RIAs. Legacy Capital Group California is the primary client of REACT. React owners are: Richard Baer 37.5%, Brent Bunger 37.5%, Andrew Baugh 20%, Kim Lawson 5%. REACT shares office space and some employees with LCG.</p>	
Part II, Page 4 Item 8C (1)(3)	<p>Advisory clients are hereby advised:</p> <ul style="list-style-type: none"> • A conflict exists between the interests of LCG and the interests of the client • The client is under no obligation to act upon the investment adviser's recommendation • If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. <p>Richard E. Baer, Brent C. Bunger, and Andrew G. Eakin are registered representatives with NFP Securities, Inc., a registered Broker-Dealer and investment advisor. An inherent conflict of interest exists as Messrs. Baer, Bunger and Eakin may receive securities commissions in addition to advisory fees. Clients will be under no obligation to purchase securities through Messrs. Baer, Bunger, Eakin nor through NFP Securities, Inc. LCG has relationships that are material to its business with the following money managers and hedge funds:</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Legacy Capital Group California

IRS Empl. Ident. No.:

94-2696159

Item of Form (identify)	Answer
Part II, Page 4 Items 8C(11) & 3L	<ul style="list-style-type: none"> • Niemann Capital Management • PTS • Peyser & Alexander • Santa Barbara • Forest Hill • AGL • Majesty • Lattice • Snow • CNL • Inland • Al Frank Asset Management • Contravisory • Moody Aldridge Partners • Tactical Allocation Group (TAG) <p>LCG does not, but Richard E. Baer, Brent C. Bunger, and Andrew G. Eakin along with other firm employees maintain resident insurance licenses with the state of California. The corporate insurance license is in the name of Baer & Bunger Financial & Insurance Services, LLC. They may sell insurance products to clients. An inherent conflict of interest exists as they may receive insurance commissions in addition to advisory fees. Clients will be under no obligation to purchase insurance through Messrs. Baer, Bunger, Eakin nor the insurance companies they represent. The other firm employees maintaining insurance licenses are: Kim Lawson, Amy Cono, Jennifer Brannon, and Juliana Ghukasyan.</p> <p>LCG and Richard E. Baer have real estate brokers licenses. Clients are made aware that securities- investing carries inherent risk. Furthermore, they are informed that using the proceeds from real estate collateralized loans to speculate on the overall market or individual securities is not prudent. LCG has policies and procedures in place to address these issues. LCG has relationships that are material to its business with the following real estate lenders:</p> <ul style="list-style-type: none"> • Cupertino Capital • Bella Vista <p>LCG also has relationships that are material to its business with CTAC a charitable trust administrator, CRT-Pro a charitable trust administrator and AGL a company that provides variable annuity and variable life private placements.</p>

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**Schedule F of
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Applicant:
Legacy Capital Group California

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Legacy Capital Group California		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Part II, Page 5 Item 9B	<p align="center"><u>Participation or Interest in Client Transactions:</u></p> <p>Richard E. Baer, Brent C. Bunger, and Andrew G. Eakin will inform clients that they may purchase securities through NFP Securities, Inc. if they so choose. In the event clients freely elect to invest in securities through this relationship with NFP, Messrs. Baer, Bunger and Eakin may act as registered representatives in resulting transactions. Clients are hereby informed that they are under no obligation to purchase securities through Messrs. Baer and Bunger, nor through NFP Securities, Inc.</p>	
Part II, Page 5 Item 9E	<p>Richard E. Baer, Brent C. Bunger , and Andrew G. Eakin may purchase the same securities for their personal accounts that they recommend to clients. Should this occur, they will ensure that clients' transactions are executed in accordance with NASD, SEC and applicable state requirements. Furthermore, LCG will implement and enforce procedures to monitor the personal trading activity of its principals and associated persons.</p>	
Part II, Page 6 Item 12B	<p>Richard E. Baer, Brent C. Bunger, and Andrew G. Eakin hereby inform their clients that they are registered representatives with NFP Securities, Inc. In appropriate situations, clients may be referred to NFP Securities, Inc. for implementation of a financial or other investment plan. Clients are under no obligation to purchase securities through Messrs. Baer, Bunger, or Eakin or through NFP Securities, Inc. As registered representatives of NFP Securities, Inc., advisory associates may receive payments from certain mutual funds distributed pursuant to a 12b-1 distribution plan or other such plans as compensation for administrative services. As such, a substantial conflict of interest may exist with respect to recommendations to buy or sell these and other securities.</p>	
Part II, Page 6 Item 13A, B	<p>LCG and its associates may from time to time enter into arrangements with non-clients that may result in fees paid to the advisor. For instance, the advisor may recommend a non-security, such as a First Trust Deed, to an investor, for which the advisor may receive a portion of the fees. The advisor may receive finder's fees or other solicitation fees for referring clients to third party investment advisers and hedge funds. Likewise, third parties may pay finders fees and other solicitation fees to LCG for its referrals of individuals to their services or programs including but not limited to non-clients, investment advisors, accountants, qualified individuals, and/or law firms.</p> <p>From time to time, LCG may pay referral fees to individuals qualified as solicitors. These and all such referral fees will be made and or received in accordance with SEC Rules.</p>	
Best Practices Code of Ethics	<p>LCG, consistent with industry best practices and SEC requirements has adopted a written Code of Ethics covering all supervised persons. Our firm's Code of Ethics requires high standards of business conduct and compliance with federal securities laws.</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Legacy Capital Group California

SEC File Number:
801- 69566

Date:
03-15-2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Legacy Capital Group California		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Privacy	<p>LCG maintains safeguards to comply with federal and state standards to guard each client's nonpublic personal information. LCG does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:</p> <ul style="list-style-type: none"> • As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account • As required by regulatory authorities or law enforcement officials who have jurisdiction over LCG or as otherwise required by any applicable law; and • To the extent reasonably necessary to prevent fraud and unauthorized transactions. 	
Proxy Voting	<p>LCG has no authority to vote proxies on behalf of advisory clients. The firm may offer assistance as to proxy matters upon a client's request, but the client always retains the proxy voting responsibility, as well as the ability to transfer that voting responsibility to a third party money manager, not affiliated with Legacy Capital Group, if they desire.</p>	
Business Continuity Plan	<p>As part of its fiduciary duty to its clients and as a matter of best business practices LCG has adopted policies and procedures for disaster recovery and for continuing LCG's business in the event of an emergency or a disaster. These policies are designed to allow LCG to resume providing service to its clients in as short a period of time as possible. These policies are, to the extent practicable, designed to address those specific types of disasters that LCG might reasonably face given its business and location.</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Legacy Capital Group California

SEC File Number:
801- 69566

Date:
03-15-2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Legacy Capital Group California

IRS Empl. Ident. No.:

Item of Form (identify)	Answer

(Complete amended pages in full, circle amended items and file with execution page (page 1).)