

LEGACY CAPITAL WEALTH PARTNERS, LLC
FORM ADV PART 2A, APPENDIX 1 WRAP PROGRAM

Item 1 – Cover Page

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This Wrap Program brochure provides information about the qualifications and business practices of Legacy Capital Wealth Partners, LLC. If you have any questions regarding the contents of this brochure, please do not hesitate to contact our Chief Compliance Officer, Peter Kennedy, by telephone at (973) 309-4382 or by email at peterkennedy2@verizon.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Legacy Capital Wealth Partners, LLC is a registered investment advisor. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training. Additional information about Legacy Capital Wealth Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

January 12, 2018

Item 2 – Material Changes

Form ADV Part 2 requires registered investment advisors to amend their wrap fee program brochure when information becomes materially inaccurate. If there are any material changes to an advisor's wrap fee program brochure, the advisor is required to notify you and provide you with a description of the material changes.

As Legacy Capital Wealth Partners, LLC is a newly-registered investment advisor, there are no material changes to disclose.

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Item 4 – Services, Fees, and Compensation

The Legacy Capital Wealth Partners Wrap Program (the “Program”) is an investment advisory program sponsored by Legacy Capital Wealth Partners, LLC (“Legacy” or the “Firm”). This Brochure describes the Program as it relates to clients receiving services through the Program. In addition to the Program, the Firm offers a variety of advisory services, which include holistic and personalized financial planning and discretionary and non-discretionary investment advisory services under different arrangements than those described herein. Information about these services is contained in the Firm’s Disclosure Brochure, which appears as Part 2A of the Firm’s Form ADV.

Description of the Program

The Program is offered as a wrap fee program, which provides clients utilizing the portfolio management services of Legacy with the ability to trade in certain investment products without incurring separate brokerage commissions or transaction charges. A wrap fee program is considered as any arrangement under which clients receive investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisors) and the execution of designated client transactions for a specified fee or fees not based upon transactions in their accounts.

Prior to receiving services through the Program, clients are required to enter into a written agreement with Legacy setting forth the relevant terms and conditions of the advisory relationship (the “Agreement”). Clients must also open a new securities brokerage account and complete a new account agreement with Schwab Advisor Services (“Schwab”), the (“Program Broker”).

Legacy provides investment management services as the sponsor and manager of the Program. Legacy primarily allocates client assets among various mutual funds, exchange-traded funds (“ETFs”), alternative investments, options, individual debt and equity securities, and independent investment managers of separately managed accounts (“External Managers”) in accordance with clients’ stated investment objectives. Under the Program, the client pays a single fee (the “Program Fee”) for Legacy’s investment advice, fees and expenses of external managers and investment platforms, and custody and commissions for securities transactions executed at Schwab.

Fees

The Program Fee

The Program Fee is negotiable, and may vary based on multiple factors, including, but not limited to, the size and nature of the relationship, the services rendered, the nature and complexity of the

products and investments involved, time commitments, and travel requirements. The Program Fee charged by the Firm will apply for all of the client's assets designated for inclusion in the Program.

The Program Fee covers Legacy's advisory services, fees and expenses of external managers and investment platforms, and custody and commissions for securities transactions effected through Schwab. The Program Fee does not include the fees and expenses of the underlying mutual funds or ETFs, as described in greater detail in the "Additional Fees and Expenses" section below, or mark-ups and mark-downs embedded in fixed income transactions. The number of transactions made in clients' accounts, the size of the accounts, and the securities used to construct a portfolio, as well as the commissions charged for each transaction, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Participants in the Program may pay a higher or lower aggregate fee than if investment management and brokerage services are purchased separately. Legacy does not charge its clients higher advisory fees based on their trading activity, but clients should be aware that Legacy may have an incentive to limit its trading activities in client accounts because Legacy is charged for executed trades.

Cash Positions

At any specific point in time, depending upon perceived or anticipated market conditions or events (there being no guarantee that such anticipated market conditions/events will occur), Legacy may maintain cash positions for defensive or other purposes. All cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating the Program Fee.

Additional fees and expenses

In addition to the Program Fee, clients will be responsible for the fees and expenses of the underlying mutual funds, ETFs, transfer taxes, odd lot differentials, exchange fees, interest charges, ADR processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law, retirement plan account fees (where applicable), electronic fund and wire fees. Clients should review the applicable prospectuses for additional information about fund fees and expenses.

The Program Fee generally does not cover mark-ups or mark-downs for fixed income transactions. Fixed income transactions usually are cleared net, without any commissions. However, the broker-dealers executing fixed income transactions typically assess mark-ups or other trading related costs that are embedded into the price of the security allocated to client accounts. Legacy's fee also does not cover transaction fees or "trade away" fees imposed for trades placed away from Schwab.

Payment of Fees

If based on a percentage of the value of assets under management, the Program Fee for the initial quarter is payable on a pro rata basis, in arrears, based on the period ending value of the net billable assets under management. For subsequent quarters, the advisory fee generally is payable in advance (except for services to participant-directed 401k plans, which generally are payable in arrears), based on the average daily net billable asset value of the client's accounts through the last day of the previous quarter as provided by third-party sources.

Legacy generally deducts its Program Fee from a client's investment account(s) held at his/her custodian. Upon engaging Legacy to manage such account(s), a client grants Legacy this limited authority through a written instruction to the custodian of his/her account(s).

Compensation for Recommending the Program

Legacy's advisory persons who recommend the Program to clients do not receive additional compensation as a result of a client's participation in the Program.

Item 5 – Account Requirements and Types of Clients

Legacy's clients generally include individuals, including high net worth individuals, families, family offices, trusts, businesses, charitable foundations, and retirement/profit-sharing plans.

Accounts in the Program may be subject to a minimum annual Program Fee at the discretion of Legacy management. Additionally, certain External Managers may impose more restrictive account requirements and varying billing practices than Legacy. In such instances, Legacy may alter its corresponding account requirements and/or billing practices to accommodate those of the External Managers.

Item 6 – Portfolio Manager Selection and Evaluation

Legacy generally recommends that clients authorize active discretionary management of all or a portion of their assets designated to the Program by certain External Managers in addition to the utilization, where appropriate, of passive investment vehicles. To the extent applicable, Legacy recommends or selects External Managers consistent with the client's investment objectives. Factors which Legacy considers in recommending or selecting External Managers include the client's stated investment objective(s), risk profile and financial condition and the External Manager's management style, performance, reputation, financial strength, and the results of Legacy's research.

Legacy does not independently validate the performance of External Managers and does not perform independent due diligence on the External Managers. Legacy relies on the due diligence performed on the External Managers by their platform manager.

Legacy acts as a portfolio manager for the Program. However, Legacy does not receive fees for its investment management services that are in addition to the Program Fee.

Other Advisory Business Services

Legacy offers a variety of advisory services, which include financial planning, institutional consulting, and investment management services. Legacy tailors its advisory services to meet the needs of its individual clients and seeks to manage client portfolios in a manner consistent with those needs and objectives. Legacy consults with clients on an initial and periodic basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to inform Legacy of any changes to their investment objectives, risk tolerance or financial circumstances.

Performance Based Fees and Side-By-Side Management

Neither Legacy nor any supervised person of Legacy accepts performance-based fees.

Methods of Analysis, Investment Strategies

Legacy primarily employs fundamental analysis methods in developing investment strategies for its clients. Research and analysis from Legacy is based on numerous sources, including third-party research materials and publicly-available materials, such as company annual reports, prospectuses, and press releases.

Legacy generally employs a long-term investment strategy for its clients, if consistent with their financial goals. Legacy will typically hold all or a portion of a securities position for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of clients. At times, the Firm may also buy and sell positions that are more short-term in nature, depending on the goals of the client and/or the fundamentals of the security, sector or asset class.

Risk of Loss

Investing in securities involves a risk of loss. A client can lose all or a substantial portion of his/her investment. A client should be willing to bear such a loss. Some investments are intended only for sophisticated investors and can involve a high degree of risk.

Material Risks Involved

The mutual funds, ETFs and External Managers that the Firm frequently invests client assets with or recommends to clients generally own securities and therefore also involve the risk of loss that is inherent in investing in securities. The extent of the risk of ownership of fund shares generally depends on the type and number of securities held by the fund. Mutual funds invested in fixed income securities are subject to the same interest rate, inflation, and credit risks associated with the fund's underlying bond holdings. Fixed income securities may decrease in value as a result of many factors, for example, increases in interest rates or adverse developments with respect to the creditworthiness of the issuer. Risks also may be significantly increased if a mutual fund pursues an alternative investment strategy. An investment in an alternative mutual fund involves special risks such as risk associated with short sales, leveraging the investment, potential adverse market forces, regulatory changes, and potential illiquidity. Investing in alternative strategies presents the opportunity for significant losses. Returns on mutual fund investments are reduced by management costs and expenses.

An ETF's risks include declining value of the securities held by the ETF, adverse developments in the specific industry or sector that the ETF tracks, capital loss in geographically focused funds because of unfavorable fluctuation in currency exchange rates, differences in generally accepted accounting principles, or economic or political instability, tracking error, which is the difference between the return of the ETF and the return of its benchmark and trading at a premium or discount, meaning the difference between the ETF's market price and NAV. ETFs also are subject to the individual risks described in their prospectus. Although many mutual funds and ETFs may provide diversification, risks can be significantly increased if a mutual fund or ETF is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage to a significant degree, or concentrates in a particular type of security. One of the main advantages of mutual funds and ETFs is that they give individual investors access to professionally managed, diversified portfolios of equities, bonds and other securities.

Although the goal of diversification is to combine investments with different characteristics so that the risks inherent in any one investment can be balanced by assets that move in different cycles or respond to different market factors, diversification does not eliminate the risk of loss. In some circumstances, price movements may be highly correlated across securities and funds. A specific fund may not be diversified and a client portfolio may not be diversified. Additionally, when diversification is a client objective, there is risk that the strategies that the Firm uses may not be successful in achieving the desired level of diversification. There is also risk that the strategies, resources, and analytical methods that the Firm uses to identify mutual funds and ETFs will not be successful in identifying investment opportunities.

The following risk also could cause mutual funds, ETFs, and other investments managed for clients, as well as those managed by External Managers, to decrease in value:

- Market Risk: The price of an equity security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, changes in political, economic and social conditions may trigger adverse market events.
- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Event Risk: An adverse event affecting a particular company or that company's industry could depress the price of a client's investments in that company's stocks or bonds. The company, government or other entity that issued bonds in a client's portfolio could become less able to, or fail to, repay, service or refinance its debts, or the issuer's credit rating could be downgraded by a rating agency. Adverse events affecting a particular country, including political and economic instability, could depress the value of investments in issuers headquartered or doing business in that country.
- Liquidity Risk: Securities that are normally liquid may become difficult or impossible to sell at an acceptable price during periods of economic instability or other emergency conditions. Some securities may be infrequently or thinly traded even under normal market conditions.
- Leverage Risk: The use of leverage may lead to increased volatility of a fund's NAV and market price relative to its common shares. Leverage is likely to magnify any losses in the fund's portfolio, which may lead to increased market price declines. Fluctuations in interest rates on borrowings or the dividend rates on preferred shares that take place from changes in short- term interest rates may reduce the return to common shareholders or result in fluctuations in the dividends paid on common shares. There is no assurance that a leveraging strategy will be successful.
- Domestic and/or Foreign Political Risk: The events that occur in the U.S. relating to politics, government, and elections can affect the U.S. markets. Political events occurring in the home country of a foreign company such as revolutions, nationalization, and currency collapse can have an impact on the security.

- Inflation Risk: Countries around the globe may be more, or less, prone to inflation than the U.S. economy at any given time. Companies operating in countries with higher inflation rates may find it more difficult to post profits reflecting its underlying health.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the U.S. dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This risk is 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.
- Operational Risk: Fund Advisors and other ETF service providers may experience disruptions or operating errors such as processing errors or human errors, inadequate or failed internal or external processes, or systems or technology failures, that could negatively impact the ETF.
- Regulatory/Legislative Developments Risk: Regulators and/or legislators may promulgate rules or pass legislation that places restrictions on, adds procedural hurdles to, affects the liquidity of, and/or alters the risks associated with certain investment transactions or the securities underlying such investment transactions. Such rules/legislation could affect the value associated with such investment transactions or underlying securities
- Illiquid Securities: Investments in hedge funds and other private investment funds may underperform publicly offered and traded securities because such investments:
 - typically require investors to lock-up their assets for a period and may be unable to meet redemption requests during adverse economic conditions;
 - Have limited or no liquidity because of restrictions on the transfer of, and the absence of a market for, interests in these funds;
 - Are more difficult for to monitor and value due to a lack of transparency and publicly available information about these funds;
 - May have higher expense ratios and involve more inherent conflicts of interest than publicly traded investments; and
 - Involve different risks than investing in registered funds and other publicly offered and traded securities. These risks may include those associated with more concentrated, less diversified investment portfolios, investment leverage and investments in less liquid and non-traditional asset classes.

Past performance of a security or a fund is not necessarily indicative of future performance or risk of loss.

Use of Independent Managers

As stated above, Legacy may select certain External Managers to manage a portion of its clients' assets. In these situations, Legacy conducts due diligence of such managers, but the success of such recommendations rely to a great extent on the External Managers' ability to successfully implement their investment strategies. In addition, Legacy generally may not have the ability to supervise the External Managers on a day-to-day basis.

Voting Client Securities

Legacy does not accept the authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for all and any securities maintained in client portfolios.

Performance-Based Fees and Side-by-Side Management

Legacy does not charge performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance based fees. Legacy's fees are calculated as described in Item 4 above.

Item 7 – Client Information Provided to Portfolio Managers

Legacy strives to provide investment advisory services specific to needs of each client. Prior to providing investment advisory services, an investment advisor representative will discuss with each client, their investment objective(s). Legacy then allocates each client's investment assets consistent with their designated investment objective(s). Clients may, at any time, impose reasonable restrictions, in writing, on Legacy's services.

It remains the responsibility of each client to advise Legacy if there is ever any change in their financial situation or investment objectives.

Clients participating in the Program generally grant Legacy the authority to discuss certain non-public information with the External Managers engaged to manage their accounts. Depending on the specific arrangement, the Firm may be authorized to disclose various personal information including, but not limited to: names, phone numbers, addresses, social security numbers, tax identification numbers, and account numbers. Legacy may share also certain information related to its clients' financial positions and investment objectives in an effort to ensure that the External

Managers' investment decisions remain aligned with the Firm's clients' best interests. This information is communicated as necessary for the management of its clients' portfolios.

Item 8 - Client Contact with Portfolio Managers

Clients have reasonable access to the Program's portfolio managers.

Item 9 – Additional information

A. Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Legacy and the integrity of Legacy's management. Legacy has no information applicable to this Item.

B. Other Financial Industry Activities and Affiliations

Recommendation of External Managers

Legacy may recommend that clients use External Managers based on the client's needs and suitability. Legacy does not receive separate compensation, directly or indirectly, from such external managers for recommending that clients use their services. Legacy does not have any other business relationships with the recommended External Managers.

Licensed Insurance Agents

A number of the Firm's advisory persons may be licensed insurance agents affiliated with Legacy may offer certain insurance products on a fully-disclosed commissionable basis. A conflict of interest exists to the extent that Legacy recommends the purchase of insurance products where its advisory persons may be entitled to insurance commissions or other additional compensation. Clients are under no obligation to purchase insurance products through any person affiliated with Legacy. The Firm has procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

C. Code of Ethics, Participation or Interest in Client Transactions

Description of Code of Ethics

Legacy has a Code of Ethics (the "Code") which requires Legacy's employees ("supervised persons") to comply with their legal obligations and fulfill the fiduciary duties owed to the Firm's clients. Among other things, the Code of Ethics sets forth policies and procedures related to conflicts of interest, outside business activities, gifts and entertainment, compliance with insider trading laws and policies and procedures governing personal securities trading by supervised persons.

Personal securities transactions of supervised persons present potential conflicts of interest with the price obtained in client securities transactions or the investment opportunity available to clients. The Code addresses these potential conflicts by prohibiting securities trades that would breach a fiduciary duty to a client and requiring, with certain exceptions, supervised persons to report their personal securities holdings and transactions to Legacy for review by the Firm's Chief Compliance Officer. The Code also requires supervised persons to obtain pre-approval of certain investments, including initial public offerings and limited offerings.

Legacy will provide a copy of the Code of Ethics to any client or prospective client upon request.

D. Receipt of Economic Benefit

Legacy generally recommends that its investment management clients utilize the custody and brokerage services of an unaffiliated broker/dealer custodians (a "BD/Custodian") with which Legacy has an institutional relationship. Currently, this includes Schwab Advisor Services, a division of Charles Schwab & Co., Inc. ("Schwab"), which is a "Qualified Custodian" as that term is described in Rule 206(4)-2 of the Investment Advisers Act of 1940. Each BD/Custodian provides custody of securities, trade execution, and clearance and settlement of transactions placed by Legacy. If client accounts are custodied at Schwab, Schwab will hold the client's assets in a brokerage account and buy and sell securities when we instruct them to.

In deciding to recommend Schwab, some of the factors that Legacy considers include:

- Trade order execution and the ability to provide accurate and timely execution of trades;
- The reasonableness and competitiveness of commissions and other transaction costs;
- Access to a broad range of investment products;
- Access to trading desks;
- Technology that integrates within Legacy's environment, including interfacing with Legacy's portfolio management system;
- A dedicated service or back office team and its ability to process requests from Legacy on behalf of its clients;
- Ability to provide Legacy with access to client account information through an institutional website; and
- Ability to provide clients with electronic access to account information and investment and research tools.

Legacy may place portfolio transactions through the BD/Custodian where the clients' accounts are custodied. In exchange for using the services of the BD/Custodian, Legacy may receive,

without cost, computer software and related systems support that allows Legacy to monitor and service its clients' accounts maintained with such BD/Custodian.

Schwab also makes available to the Firm products and services that benefit the Firm but may not directly benefit the client or the client's account. These products and services assist us in managing and administering client accounts. They include investment research, both Schwab's own and that of third parties. Legacy may use this research to service all or some substantial number of client accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to the Firm. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide the Firm with other benefits such as occasional business entertainment of Firm personnel.

Transition-related expenses: In connection with the launch of Legacy and the Firm's intention to recommend that clients custody their assets with Schwab, Schwab has agreed to provide Legacy with reimbursement of Transfer or Account Exit Fees and for eligible third party vendor services and services provided by Schwab affiliates in amounts that are based on the transfer of non-negotiable assets to the Schwab platform. Please see Item 12 of Legacy's ADV Part 2A brochure for further detail.

These products and services from Schwab benefit Legacy in that Legacy does not have to purchase them. The benefits may incentivize Legacy to routinely recommend Schwab as custodian over custodians who do not offer such products and services.

Legacy will periodically review its arrangements with the BD/Custodians and other broker-dealers against other possible arrangements in the marketplace as it strives to achieve best execution on behalf of its clients. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including, but not limited to, the following:

- a broker-dealer's trading expertise, including its ability to complete trades, execute and settle difficult trades, obtain liquidity to minimize market impact and accommodate unusual market conditions, maintain anonymity, and account for its trade errors and correct them in a satisfactory manner;
- a broker-dealer's infrastructure, including order-entry systems, adequate lines of communication, timely order execution reports, an efficient and accurate clearance and settlement process, and capacity to accommodate unusual trading volume;
- a broker-dealer's ability to minimize total trading costs while maintaining its financial health, such as whether a broker-dealer can maintain and commit adequate capital when necessary to complete trades, respond during volatile market periods, and minimize the number of incomplete trades;
- a broker-dealer's ability to provide research and execution services, including advice as to the value or advisability of investing in or selling securities, analyses and reports concerning such matters as companies, industries, economic trends and political factors, or services incidental to executing securities trades, including clearance, settlement and custody; and
- a broker-dealer's ability to provide services to accommodate special transaction needs, such as the broker-dealer's ability to execute and account for client-directed arrangements and soft dollar arrangements, participate in underwriting syndicates, and obtain initial public offering shares.

As described above, Schwab provides to Legacy, without cost, research and trade execution services. Schwab makes these services available to similarly situated investment advisers whose clients custody their assets with Schwab. Access to research and trade execution services is not predicated on the execution of client securities transactions (e.g., not "soft dollars.") Legacy has not entered into any formal "soft dollar" arrangements with broker-dealers.

E. Review of Accounts

Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Legacy monitors investment advisory portfolios as part of a continuous and ongoing process. Legacy client advisors have at least one annual meeting with each client to review the clients' accounts. These reviews may include the following:

- compare the account's allocation with stated goals and client cash-flows at time of review;
- review holdings and consider alternatives;
- monitor the size of individual securities relevant to their sectors, asset classes, and overall account size;
- analyze an account's composition and performance, income, appreciation, gains/losses, and asset allocation; and
- assess its performance.

Factors that may trigger an additional review, other than a periodic review, include: material market, economic or political events, and known significant changes in a client's financial situation and/or objectives. Clients are encouraged to notify Legacy if changes occur in the client's personal financial situation that might adversely affect the client's investment plan.

Other Reviews

Legacy may perform compliance and/or supervisory reviews of a sampling of client accounts. These reviews may include comparing an account's strategy and/or allocation to the account's stated objectives, reviewing commission and transaction costs borne by the account, and reviewing the billing rate and charges.

Content and Frequency of Regular Reports Provided to Clients

Legacy Capital intends to provide quarterly performance reports to clients within 30 days of the end of each calendar quarter. Additionally, Legacy Capital offers its clients access to an online reporting platform that updates performance and holdings daily. Clients will also receive brokerage statements no less than quarterly from the qualified custodian. These brokerage statements are sent directly from the custodian to the client. The client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the client's account[s]. The client advisor may also provide clients with periodic reports regarding their holdings, allocations, and performance.

F. Client Referrals and Other Compensation

Economic Benefits Provided by Third Parties for Advice Rendered to Clients

Legacy does not receive benefits from third parties for providing investment advice to clients.

Compensation to non-Supervised Persons for Client Referrals

Legacy does not currently have referral arrangements with solicitors, but may in the future enter into referral arrangements with unaffiliated individuals who may from time-to-time refer potential investors to Legacy for investment management services and be compensated for successful referrals by receiving a percentage of the advisory fee Legacy receives from such clients. Any such arrangements must be in compliance with Rule 206(4)-3 of the Investment Advisers Act.

G. Financial Information**Balance Sheet**

Legacy does not require prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore does not need to include a balance sheet with this wrap fee program brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Legacy nor its management have any financial conditions that are reasonably likely to impair its ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Years

Legacy has not been the subject of a bankruptcy petition.