

## **PART 2A FORM ADV**

**AS OF:  
May 14, 2020**

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CRD# 108207**

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

This document provides information about the qualifications and business practices of Legend Financial Advisors, Inc.<sup>®</sup> If you have any questions about the contents, please contact us at: (412) 635-9210, or by E-mail at: [legend@legend-financial.com](mailto:legend@legend-financial.com). The information within has been filed with the United States Securities and Exchange Commission (SEC), and any state securities authority requiring. \*

Additional information about Legend Financial Advisors, Inc.<sup>®</sup> is available on the SEC’s Website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

\* The SEC does not approve and/or verify any of the information.

## **MATERIAL CHANGES:**

### **Annual Update:**

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

### **Material Changes After The Last Amendment:**

There are no material changes in this brochure from the last annual updating amendment of Legend Financial Advisors, Inc.® on 05/12/2020. Material changes relate to Legend Financial Advisors, Inc.® policies, practices or conflicts of interests only.

### **Additional Copies:**

To receive additional copies, please contact them by telephone at: (412) 635-9210 or by E-mail at: [legend@legend-financial.com](mailto:legend@legend-financial.com).

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## **ADVISORY BUSINESS:**

### **Firm Description:**

Legend Financial Advisors, Inc.<sup>®</sup> ("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.

Upon retention and depending upon the Client's situation and needs, advice will be provided but is not limited to one or more of the following services:

1. Financial Objective Determination;
2. Financial Problem Identification;
3. Cash Flow Consulting;
4. Income Tax Planning;
5. Insurance Coverages Review;
6. Investment Management/Consulting;
7. Education Planning;
8. Retirement Planning;
9. Estate Planning;
10. Other Potential Services.

Portfolios and the underlying investments are generally reviewed at The Company's discretion depending upon, but not limited to, client circumstances, cash inflows and outflows, if material, and political and economic conditions as well as investment and financial market conditions and movements.

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

### **Principal Owners:**

Louis P. Stanasolovich and Celine M. Stanasolovich are each 48.5% shareholders. The remaining 3.0% of ownership is owned by two (2) other employees.

## **Types of Advisory Services:**

### **Financial Planning Services:**

The Company offers, at times, Financial Planning services to individuals and families on an hourly basis at The Company's stated billing rates or on a fixed rate basis. Financial Planning services are generally not offered without the retention of the firm for 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 includes one or more of the following topics:

1. Analysis Of Overall Financial Well Being
2. Current Cash Flow Analysis
3. Income Tax Planning, Projections And Tax Reduction Strategies
4. Education Projections, Funding And Counseling For Other Educational Issues
5. Retirement Projections, Withdrawals From Retirement Accounts And Counseling For Other Retirement Issues
6. Estate Document Review, Estate And Inheritance Tax Reduction Strategies, Beneficiary Coordination And Asset Retitling
7. Insurance Policy Type Reviews Including Survivor Needs Analysis And Liability Assessments
8. Review Of All Employee Benefits
9. Advise Clients Where Possible As To How To Manage Their Debts
10. General Recommendations With Regard To Investments

Recommendations will be provided in all the above areas mentioned when retained by the Client to do so. Implementation of the recommendations is at the discretion of the Client.

### **Investment Services:**

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

The assets to be managed and/or overseen will be designated by the Client. An analysis of the Client's current family, financial, long-term objectives and the preparation of recommendations will be made.

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

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

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

### **Discretionary Investment Management Services:**

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

Most portfolios can include open-end and closed-end mutual funds and Exchange-Traded products, but some portfolios in certain cases could include individual securities such as bonds, stocks and other types of investments unless the Client has otherwise restricted their usage in writing. Investment securities will be selected on the basis of any or all of the following criteria: the investment's performance history; the industry/sector; country and/or region it is located in; statistical measures; valuation of the investment or asset class as are applicable; the mutual fund/investment manager; the mutual fund/investment manager's style and philosophy; and the mutual fund/investment manager's fee structure among other criteria as well as their income tax-efficiency, if applicable.

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

### **Discretionary Investment Management Consulting Services:**

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

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



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

The Company manages securities portfolios for this Investment Service similar to “Discretionary Investment Management Services” mentioned above. If the assets are held at Custodians not on The Company’s Preferred Custodians list, The Company will advise the Client as to how to position those assets. Upon direction by The Company trade executions of such securities will need to be traded directly by the Client or in conjunction with the Client and The Company. It is solely the responsibility of the Client to reposition these assets in this type of situation although; the Client can request The Company’s assistance.

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

### **Investment Consulting Fixed Fee Services:**

This service is for clients who have a large proportion of their assets in complex securities that require significantly more research and oversight. These assets could also include accounts and/or investments that will not be directly managed and/or valued except for once per year and are therefore outside of The Company’s Discretionary Investment Services. These assets, in most cases, will be held at Custodians other than The Company’s preferred Custodians. Performance return information for some of these assets may not be able to be provided by The Company.

In some situations, The Company could possibly manage a portion of the investment assets on a discretionary basis.

For the portion of investment assets that are not managed on a discretionary basis, The Company will only consult, if retained to do so. 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 the Client’s comfort with risk, their goals and objectives as well as the Client’s income tax situation to a degree, The Company will develop an initial investment strategy to address the Client’s needs. The recommended investment strategy will incorporate a portfolio of investments appropriate for the Clients’ circumstances. Upon mutual agreement with the Client regarding the recommended investment strategy, a portfolio will be implemented. Thereafter, The Company will provide ongoing management of the investment assets at its sole discretion without first consulting the Client. However, should the Client circumstances and/or wishes change after the initial recommendations are developed, the Client will need to notify The Company. The Company will 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 could 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 based on any or all 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 and/or asset class as applicable; the mutual fund/investment manager; the mutual fund/investment manager's style and philosophy; and the mutual fund/investment manager's fee structure among other criteria as well as their income tax-efficiency.

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

#### **Discretionary Investment Management Consulting and Financial Planning Services:**

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

#### **Discretionary Sub-Advisory Investment Management Services:**

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

The Company will only sub-advise the Advisor's Client accounts that are held at one or more of The Company's preferred custodians.

The Advisor will have the responsibility of discussing the Client's goals, portfolio objectives, ongoing needs and risk tolerance with the Client as well as, communicating any special requirements of a client with The Company (Sub-Advisor). The Advisor will be responsible for establishing and terminating accounts at the applicable custodians as well as requesting withdrawals and facilitating deposits into accounts.

#### **Investment Services For Retirement Plans:**

##### **Discretionary Investment Management Services For 401(k), 401(a) And 403(b) Multi-Participant Qualified Retirement Plans Where Participants Select From A Menu Of Individual Investments (Open-End Mutual Funds and Exchange-Traded Funds):**

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. The Plan Sponsors and/or Trustees 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 Sponsors and/or Trustees 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 or a 3(21) Investment Advisor if so designated by the Plan Sponsors and/or Trustees.

1. A 3(38) Investment Manager would select the investment options for the plan. [Please note a 3(21) Investment Advisor does this in conjunction with the Plan Sponsor's Investment Committee].
2. A 3(38) Investment Manager would 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. [Please note a 3(21) Investment Advisor does this in conjunction with the Plan Sponsor's Investment Committee].
3. A 3(38) Investment Manager would monitor the investment options and portfolios on an ongoing discretionary basis and make changes when appropriate. [Please note a 3(21) Investment Advisor does this in conjunction with the Plan Sponsor's Investment Committee].
4. A 3(38) Investment Manager would, at least annually, provide the Plan Sponsors and/or Trustees with an overview regarding the selection of the investment options offered to plan participants. The Company if requested by the Plan Sponsors and/or Trustees to manage portfolios will provide information regarding the portfolios. This should enable the Plan Sponsor and/ or Trustee to fulfill its fiduciary responsibility regarding the sponsor's retention of the manager. [Please note a 3(21) Investment Advisor does this in conjunction with the Plan Sponsor's Investment Committee].
5. A 3(38) Investment Manager would construct static portfolios to be offered to plan participants if requested by the Plan Sponsor and/or Trustee (This arrangement is no longer offered as of March 1, 2016, except to grandfathered Clients). [Please note a 3(21) Investment Advisor does this in conjunction with the Plan Sponsor's Investment Committee].

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

The Plan Sponsors and/or Trustees will offer a menu of individual investment selections. Plan Participants will select their own investment choices from that menu to invest in.

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.

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.

Static portfolios are no longer offered by The Company as of March 1, 2016, except to grandfathered Clients. The grandfathered static portfolios 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.

Investment securities of all types will be selected based on any or all 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 or investments from the menu of investments, a Qualified Default Investment Alternatives ("QDIA") will be used as a default investment selection.

Individual investments are reviewed at The Company's discretion or upon the Plan Sponsors and/or Trustees request. The Company will review the investment options depending upon, but not limited to, any of the following reasons: The Plan's circumstances, fund management changes, an increase in fund expenses, non-competitiveness of a fund's expense level, a need to add or reduce the number of fund options, etc.

For static portfolios (this is only applicable for grandfathered clients prior to March 1, 2016) reviews will be initiated by The Company for the following reasons: The Plan's circumstances, fund management changes, an increase in fund expenses, non-competitiveness of a fund's expense level, a need to add or reduce the number of fund options, etc.

For individual investment options, reviews will be initiated by The Company for the following reasons: The Plan's circumstances, fund management changes, an increase in fund expenses, non-competitiveness of a fund's expense level, a need to add or reduce the number of fund options, etc.

#### **Discretionary Investment Management Services For 401(k) Plans Where Participants Select Managed Individual Portfolios From A Menu:**

This service is no longer offered except to grandfathered clients after January 1, 2016.

The Company will manage multiple portfolios (managed portfolios) of (each has its own strategy) open-end mutual funds and Exchange-Traded products, on an ongoing discretionary basis for 401(k) retirement plans.

After an initial discussion with the Plan Sponsors and/or Trustees about the amount of acceptable risk for each portfolio as well as their goals and objectives, The Company will develop multiple investment strategies to be offered to the plan's participants.

Thereafter, The Company will provide ongoing management of the investment assets at its sole discretion without first consulting the plan sponsor. However, should the plan sponsor's circumstances and/or wishes change after the initial recommendations are developed, the plan sponsor will need to notify The Company. The Company will then consult with the Plan Sponsors and/or Trustees to develop a new investment strategy or modify the existing investment strategy.

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

## **Wrap Fee Programs:**

The Company does not participate in any wrap fee programs.

## **Client Assets:**

As of December 31, 2019, The Company manages approximately \$292,253,494 in discretionary assets for nine hundred fifty five (955) clients.

As of December 31, 2019, The Company consults upon approximately \$12,084,160 (assets under advisement) for twenty six (26) clients.

## **FEES AND COMPENSATION:**

### **Fees:**

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

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

For investment related fees only, The Company may discount the listed advisory fees up to 30.0% subject to minimum applicable fees to legal, insurance, accounting, banking, actuarial and other types of professional financial advisors and/or their firms. This discount is provided in the hope that these firms and their associated individuals may recommend The Company and/or its affiliates to their clients who need investment advisory services. However, no firm or individual who receives the discount is obligated in any way to recommend The Company to any person. There is no direct compensation paid to these firms or individuals for referring prospective clients to The Company.

The Company may also offer up to a 30.0% discount to non-profit organizations.

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

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

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

Exceptions to minimum portfolio sizes for investment services will apply to employees of The Company and their relatives. Financial Planning services are offered without charge to employees and immediate family.

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

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

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

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

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

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

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

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

## **Financial Planning Fee Information:**

### **Annual Financial Planning Flat Fee:**

Clients that had engaged The Company to provide Discretionary Investment Management Services to an account totaling \$1,500,000 or more prior to September 1, 2001 receive the financial planning service at no additional cost. As agreed between The Company and the Client, the Client may continue to have their financial planning situation reviewed as needed without additional charges so long as the Client's managed portfolio(s) with The Company

exceed a total of \$1,500,000. This arrangement is no longer offered, except to grandfathered Clients.

Clients who have retained The Company for financial planning services for an agreed upon fixed rate which is reset annually, separate from any investment assets managed or consulted upon will be billed on a fixed rate basis in advance. The fee will be billed in semi-annual increments. This type of fee does not apply to hourly Financial Planning clients.

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

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

### **Hourly Financial Planning Fee Schedule:**

The Company will charge all the staff members' applicable hourly fees listed below in arrears monthly to the Client.

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

Wealth Advisor:	\$300.00 per hour
Senior Assistant Wealth Advisor:	\$150.00 per hour
Senior Investment Analyst:	\$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

Invoices will be created monthly and sent to The Client unless other billing arrangements have been mutually agreed upon. In addition to the invoice, The Client will receive a breakout of each employee's activity and time spent completing that activity.

If monthly staff charges incurred total less than \$100.00, billing may be deferred to the following billing month for up to a maximum of three months.

In special circumstances, The Company may require a deposit (fixed rate fee) in advance of any services rendered. The deposit will be offset against the fee for any services rendered. Once the deposit amount is exhausted, The Company will require an additional deposit amount to continue services to the Client.

### **Discretionary Investment Management Fee Schedule (For Clients Who Custody At TD Ameritrade Institutional Or Shareholders Services Group, Inc./Pershing, LLC And Other Designated Custodians): (Fee Schedule for Clients Before January 1, 2019)**

The quarterly fee for each portfolio (All portfolios inception prior to May 31, 2017 will be billed separately on a fiscal quarter basis except for non-adult children's accounts. All portfolios inception after May 31, 2017 will be billed on a combined basis per family entity including non-adult children's accounts on a fiscal quarter basis.) for Discretionary Investment Management Services will be charged as a percentage of assets under management, according to the following schedule:

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

The minimum fiscal quarterly advisory fee for Investment Management cumulatively for all portfolios is \$2,187.50.



Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000. The minimum fees and portfolio sizes may prevent The Company from offering services to clients that cannot achieve these minimums. However, in extremely rare circumstances, The Company, in their sole discretion, may waive their minimum fee.

The Company has the discretion to waive the portfolio minimum size (value of \$250,000 if it deems it appropriate; i.e. for the Client as well as the children of Clients and/or relatives that live in the same household as the Client.).

Alternatively, for prospective clients, if combined portfolios do not meet the overall minimum fiscal quarterly advisory fee of \$2,187.50, they may be referred to The Company's sister firm, EmergingWealth Investment Management, Inc.<sup>®</sup> which has lower minimum fiscal quarterly advisory fees.

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

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

**Discretionary Investment Management Fee Schedule (For Clients Who Custody At TD Ameritrade Institutional Or Shareholders Services Group, Inc./Pershing, LLC And Other Designated Custodians) (Fee Schedule For New Clients as of January 1, 2019)**

The quarterly fee for each portfolio (All portfolios incepted prior to May 31, 2017 will be billed separately on a fiscal quarter basis except for non-adult children's accounts. All portfolios incepted after May 31, 2017 will be billed on a combined basis per family entity including non-adult children's accounts on a fiscal quarter basis.) for Discretionary Investment Management Services will be charged as a percentage of assets under management, according to the following schedule:

- a. .2250% on the first \$1,000,000;
- b. .1875% on the amount in excess of \$1,000,001 but not greater than \$2,000,000;
- c. .1250% on the amount in excess of \$2,000,000, but not greater than \$5,000,000;
- d. .0625% on the amount in excess of \$5,000,000.

The minimum fiscal quarterly advisory fee for Investment Management cumulatively for all portfolios is \$2,250.

Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000. The minimum fees and portfolio sizes may prevent The Company from offering services to

clients that cannot achieve these minimums. However, in extremely rare circumstances, The Company, in their sole discretion, may waive their minimum fee.

The Company has the discretion to waive the portfolio minimum size (value of \$250,000 if it deems it appropriate; i.e. for the Client as well as the children of Clients and/or relatives that live in the same household as the Client.).

Alternatively, for prospective clients, if combined portfolios do not meet the overall minimum fiscal quarterly advisory fee of \$2,250, they may be referred to The Company's sister firm, EmergingWealth Investment Management, Inc.® which has lower minimum fiscal quarterly advisory fees.

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

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

#### **Discretionary Investment Management Consulting Fee:**

For a single annual fee (The fee is normally recalculated once annually on or prior to the anniversary date, but split into four equal fiscal quarterly payments.), this service roughly follows the one for the Discretionary Investment Management Service, but may or may not involve more complex assets and/or accounts to manage. This service could include accounts and/or investments that are difficult to value except for once per year, such as retirement plan balances of the individual client(s) and/or variable annuities, or could possibly be aggregated with accounts not held at one or more of The Company's Preferred Custodians and/or with family member accounts. Furthermore, The Company may not have discretionary authority over those assets held at Custodians other than The Company's Preferred Custodians in which case, The Company will advise the client as to how these assets are to be positioned.

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

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

For Clients prior to December 31, 2018, the minimum fiscal quarterly advisory fee for Investment Management Consulting is \$2,187.50. For Clients after January 1, 2019, the minimum fiscal quarterly advisory fee for Investment Management Consulting is \$2,250.00.

Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000.

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

The Company has the discretion to waive the portfolio minimum size (value of \$250,000 if it deems it appropriate; i.e. for the Client as well as the children of Clients and/or relatives that live in the same household as the Client.).

Alternatively, for prospective clients, if combined portfolios do not meet the overall minimum fiscal quarterly advisory fee of \$2,250.00, they may be referred to The Company's sister firm, EmergingWealth Investment Management, Inc.<sup>®</sup> which has lower minimum fiscal quarterly advisory fees.

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

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

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

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

If the Client's asset level increases or decreases by 20% or more in a fiscal year, the fee will automatically be reviewed for the next fiscal quarter for adjustment.

#### **Investment Consulting Fixed Fee:**

This service is for clients who have a large proportion of their assets in complex securities that require significantly more research and oversight. These assets could also include accounts and/or investments that will not be directly managed and/or valued except for once per year and are therefore outside of The Company's discretionary investment services. These assets, in most cases, will be held at Custodians other than The Company's preferred Custodians.

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

The fee for this service will be billed in fiscal quarterly increments subject to a minimum fee of \$2,500 per fiscal quarter.

Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000.

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

The Company has the discretion to waive the portfolio minimum size (value of \$250,000 if it deems it appropriate; i.e. for the Client as well as the children of Clients and/or relatives that live in the same household as the Client.).

The fee to be paid by the Client to The Company is payable as follows: The fee shall be billed on a fiscal quarterly basis, the first of which is due upon the execution of the contract (in other words, fees are paid one fiscal quarter in advance), each subsequent quarter is due three months, six months, and nine months, respectively, after the anniversary date and on the same date(s) each year thereafter. The 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. If assets are not held at The Company's preferred Custodians, The Company will bill the Client directly.

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

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

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

If the Client's asset level increases or decreases by 20% or more in a fiscal year, the fee will automatically be reviewed for the next fiscal quarter for adjustment.

**Discretionary Investment Management Consulting and Financial Planning Fee Schedule:**

The fee is determined after a thorough analysis of the Client's financial circumstances, complexity, investment monies to be managed, estimated hourly costs of providing Financial Planning services, consulting on investments held at Custodians other than The Company's Preferred Custodians and other financial matters pertinent to the client.

The investment portion of this service could potentially include one or more portfolios and/or contains assets such as retirement plan balances and/or variable annuities which do not offer electronic downloads and, therefore; results in more staff time to value than assets held at one or more of The Company's preferred Custodians.

Furthermore, in some circumstances, the fee could be increased because The Company may not have discretionary authority over some or all assets held at other non-preferred

Custodians. In this situation, The Company will advise the Client as to how to position those assets. It is solely the responsibility of the Client to reposition these assets in this type of situation although; the Client can request The Company's assistance.

The total minimum fiscal quarterly fee is \$2,500.

Under the Discretionary Investment Management Consulting portion of this service, a client may have individual or multiple portfolios. Portfolios are subject to a minimum securities value for each portfolio of \$250,000.

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

The Company has the discretion to waive the portfolio minimum size (value of \$250,000 if it deems it appropriate; i.e. for the Client as well as the children of Clients and/or relatives that live in the same household as the Client.).

The fee to be paid by the Client to The Company is payable as follows: The fee shall be billed on a fiscal quarterly basis, the first of which is due upon the execution of the contract (in other words, fees are paid one fiscal quarter in advance), each subsequent quarter is due three months, six months, and nine months, respectively, after the anniversary date and on the same date(s) each year thereafter. The 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. If assets are not held at The Company's preferred Custodians, The Company will bill the Client directly.

If the Client requires substantially more financial planning and/or investment consulting work than budgeted for in the current annual billing arrangement due to unforeseen circumstances, The Company reserves the right to bill on an hourly basis for additional time spent by The Company's staff members. The Company will notify the Client in advance of any work that could be billed before being started. The fee schedule upon which the additional time is calculated is listed in the Hourly Financial Planning Fee Schedule or the Other Advisory Fee Schedule as applicable.

For this additional work only, invoices will be created monthly and sent to The Client unless other billing arrangements have been mutually agreed upon. In addition to the invoice, The Client will receive a breakout of each employee's activity and time spent completing that activity.

If monthly staff charges incurred total less than \$100.00, billing may be deferred to the following billing month for up to a maximum of three months.

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

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

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

If the Client's asset level increases or decreases by 20% or more in a fiscal year, the fee will automatically be reviewed for the next fiscal quarter for adjustment.

**Discretionary Sub-Advisory Investment Management Services Fee Schedule:**

The Company will provide Investment Management Services as a "Sub-Advisor" to Advisors that contract with The Company to do so. The Advisor will pay in arrears to The Company (Sub-Advisor) fiscal quarterly payments. The actual percentage charged to the Advisor will be based on the size and complexity of the Advisor's portfolio(s) to be managed.

A uniform fee schedule will be negotiated to manage all the Advisor's designated accounts.

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 Company (Sub-Advisor) 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 either instance of the termination of The Company's services, The Company shall not bear any responsibility whatsoever for any adverse financial consequences once verbal and/or written notification is provided by the Advisor to The Company that its services will be terminated, which includes, but is not limited to, investment assets with transfer and/or trading restrictions. Upon the Advisor's notification of termination to The Company, investment transactions will be processed up to and including the date of termination if written instructions are provided by the Advisor. In such case, electronic communications will not be accepted, except for facsimile transmissions.

In which case, the Advisor will pay The Company a prorata portion of any of its earned fees. All 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 by providing sixty (60) days notice.

Upon The Company's notification of termination to the Advisor, investment transactions will be processed up to and including the date of termination if written instructions are provided by the Advisor. In such case, electronic communications will not be accepted, except for facsimile transmissions.

The Company will be owed any earned fees on a prorata basis. All The Company's fees will be due and payable within thirty (30) days of termination.

Portfolios are subject to a minimum securities value of \$250,000 for each portfolio. Therefore, the minimum fees and portfolio sizes may prevent The Company from providing services to the Advisor's Clients that cannot achieve these minimums. However, The Company may waive the minimum fee for the Advisor's Clients under unusual circumstances.

The Advisor shall make their check payable to "Legend Financial Advisors, Inc.<sup>®</sup>".

### **Retirement Plans Investment Management Fee Information:**

#### **Discretionary Investment Management Services Fee Schedule For 401(k), 401(a) And 403(b) Multi-Participant Qualified Retirement Plans Where Participants Select From A Menu Of Individual Investments (Open-End Mutual Funds and Exchange-Traded Funds):**

The Company's Discretionary Investment Management fiscal quarterly fee schedule is:

- a. .1250% of the first \$3,000,000;
- b. .1000% on the next \$2,000,000;
- c. .0750% on the next \$2,500,000;
- d. .0625% on the next \$2,500,000;
- e. .0500% on assets over \$10,000,000

If the plan sponsor has selected a plan administrator that does not have the capability to charge based on the above tiered fee schedule, The Company reserves the right to charge a single fixed percentage of assets. This percentage would approximate the fee that would normally be charged as a percentage of assets based on the schedule above for the fiscal year in question. That percentage would be reassessed for the start of the next fiscal year.

The Company does not require a minimum amount of plan assets; however, there is a minimum fee of \$1,250.00 per fiscal quarter. For those plans where the fee charges as applied to the schedule above result in less than \$1,250.00 per fiscal quarter, the plan and/or retirement plan sponsor company will be billed by The Company for the difference. Under unusual circumstances, The Company may choose to waive or reduce the minimum fee.

The plan will be 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 and/or retirement plan sponsor company.

Administrators, Actuaries and/or Plan Administration Firms will apply their own fee schedule.

As of March 1, 2016, Static Models (non-managed models) of individual mutual funds and/or Exchange-Traded Funds are no longer offered except to those clients who are grandfathered.

**Discretionary Investment Management Fee Schedule For 401(k) Plans Where Participants Select Managed Individual Portfolios From A Menu:**

This service is no longer offered except to grandfathered clients after January 1, 2016.

All portfolio balances will be combined for the fee calculation. The Company's Fiscal Quarterly Discretionary Investment Management Fees will be charged as a percentage of assets under management, according to the following schedule:

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

The minimum fiscal quarterly advisory fee for investment management for all portfolios is \$2,187.50.

The plan will be 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 and/or retirement plan sponsor company.

Administrators, Actuaries and/or Plan Administration Firms will apply their own fee schedule.

**OTHER ADVISORY FEE SCHEDULE:**

**Staff Time:**

The Company will charge all the staff members' applicable hourly fees listed below in arrears on a monthly basis to the Client.

The Billing Rate Schedule for Hourly Fees 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

Invoices will be created monthly and sent to The Client unless other billing arrangements have been mutually agreed upon. In addition to the invoice, The Client will receive a breakout of each employee's activity and time spent completing that activity.

If monthly staff charges incurred total less than \$100.00, billing may be deferred to the following billing month for up to a maximum of three months.



In special circumstances, The Company may require a deposit (fixed rate fee) in advance of any services rendered. The deposit will be offset against the fee for any services rendered. Once the deposit amount is exhausted, The Company will require an additional deposit amount to continue services to the Client.

## **EXPERT TESTIMONY**

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 \$1,200.00 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 AND EXPENSES:**

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

In addition to The Company's advisory fees, clients are also responsible for the fees and expenses charged by custodians and broker-dealers. Such fees may include, but are not limited to; Custodial fees, account fees, administration fees, IRA fees, check issuance fees, wire transaction fees, checking account fees, any transaction charges, fees for duplicate and/or paper quarterly or monthly statements as well as electronic and/or paper transaction confirmation statements, and fees for electronic data feeds and reports. Termination fees may also apply to the liquidation and/or transfer of any account, including, but not limited to, retirement and non-retirement accounts.

In certain circumstances, electronic delivery may not be available

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

The fee will be billed on the annual contract date.

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

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

The Company may impose a fee for providing maintenance to a non-managed account held at one or more of The Company's Preferred Custodians that it utilizes.

### **Termination of Agreement:**

All agreements will continue in effect until terminated by either party by written notice to the other. Electronic communications will not suffice except facsimile transmission (with a hard copy provided to The Company). All parties of any of The Company's agreements must sign the Termination Schedule (Schedule T) that The Company will provide upon either party's desire to terminate the relationship. Termination of an agreement will not affect the client's obligation to pay advisory fees (prorated through the date of termination).

A client may close his/her/its account at any time and receive a refund of any unearned fee, if applicable. Similarly, any earned, unpaid fee will be due and payable upon termination.

Investment transactions will only be effected up to and including the date of termination. Upon client notification of termination and until the date of termination, The Company and/or the Sub-Advisor will only execute investment transactions based on written instructions provided by the client. Electronic communications will not suffice except by facsimile transmission.

### **Securities/Investment Products Compensation:**

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

### **Not Affiliated/Agent:**

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

### **Conflict Of Interest:**

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

## **Commissions And Other Sales Compensation:**

The Company does not sell any commissioned products. The Company is not affiliated with entities and/or individuals that sell financial products, securities and/or services for commissions. In addition, finder's fees are not accepted.

## **PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT:**

Fees are not based on a share of the capital gains or capital appreciation of managed and/or consulted upon securities.

The Company does not charge Performance-Based Fees.

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

## **TYPES OF CLIENTS:**

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.

## **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 (tactically) managed in the interest of targeting specific levels of risk and/or long-term returns. Prior to portfolio changes, due diligence and analysis on each component of a portfolio is conducted to determine the viability within a 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 portfolio 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](http://www.morningstar.com), Bloomberg Investment Service, 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 levels and performance expectations. Each portfolio is executed for each specific client based upon their answers provided when discussing their Risk Comfort Zone Questionnaire, as well as any additional objectives stated by the Client during consultations. When implementing a portfolio for a client, due to minimum portfolio investment asset requirements, a client's portfolio may not be as diversified as a similar client with larger amounts of investment assets.

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 are rarely used, but may be utilized on occasion.

Aggressive (high risk) portfolios have been developed and are maintained for clients who are comfortable with a greater level of risk and who have 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.

### **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: Movements 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 often caused by external factors independent of a security's underlying circumstances. For example, political, economic and social conditions may trigger market events.

3. Inflation or Deflation Risk: When any type of inflation is present, a U.S. Dollar or similar currency today will not buy as much as a U.S. 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 U.S. 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 an industry or a company within an industry. For example, oil-drilling companies depend on finding oil, a lengthy process, before they can generate a profit.
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 an investment. 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 ever 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 ever 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 ever 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 has not ever been registered as a broker-dealer. None of its employees are registered with a broker-dealer. The Company and its employees are not registered as a Futures Commissions Merchant, Commodity Pool Operator, Commodity Trade Advisor or as an associated person of the foregoing entities.

### **Other Affiliations:**

In addition to acting as an investment advisor, The Company also publishes client newsletters or provides editorial content to other newsletter publications which address general issues about investing and financial planning oriented topics. In either case, the editorial content provides no specific recommendations to clients and other readers and; therefore, does not address the investment needs of any client.

It is anticipated that The Company's employees and its principal executive officer will spend less than 10.0% of their time on this activity.

Wealth Advisor Publishing, Inc. which provides educational information to the financial advisory industry and the public as a publisher is 100.0% owned by Louis P. Stanasolovich, a 48.5% owner of The Company and its sister company, EmergingWealth Investment Management, Inc.<sup>®</sup>. Wealth Advisor Publishing, Inc. shares office space with The Company and EmergingWealth Investment Management, Inc.<sup>®</sup>. The Company's employees contribute services to Wealth Advisor Publishing, Inc.'s business efforts for hourly fees.

### **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 sub-advisory services to other registered investment advisors (see the section above called: Discretionary Sub-Advisory Investment Management) including EmergingWealth Investment Management, Inc.<sup>®</sup> (here-in-after known as EmergingWealth which is under the same common ownership as The Company) (see below).

As noted above, The Company provides sub-advisory services to its sister company, EmergingWealth Investment Management, Inc.<sup>®</sup>, (SEC File No. 801-70731). EmergingWealth, in addition to being commonly owned, rents the services of The Company's non-advisory

employees, technology, accounting and office space. The Company has the option to waive its sub-advisory fee to EmergingWealth. This could change at any point in time.

## **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 or disposition of any security by any employee. The Code of Ethics also includes oversight, enforcement and recordkeeping provisions. A copy of the Code of Ethics is available to The Company's advisory clients or prospective clients upon request.

### **Participation or Interest in Client Transactions:**

The Company and its employees may recommend, buy, or sell securities in clients' accounts in which The Company or its employees have a material financial interest. However, The Company will disclose this fact to clients.

### **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; seek approval of any proposed personal trades prior to execution. All transactions and investment activity must be reported 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. Personal securities trades are not allowed if the security is in a Company blackout period.

The trading of Exchange-Traded Funds, Exchange-Traded Notes or individual securities trades can affect securities market prices. 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 sub-advisory 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. The Company is not affiliated with any of the Brokerage Firms. The Brokers do not supervise The Company, its Advisors, or activities.

For investment management, investment consulting, or sub-advisory clients in need of brokerage or custodial services, and depending on client circumstances and needs, The Company may recommend the use of one of several broker-dealers including but not limited to; TD Ameritrade, Inc., and Shareholders Service Group, Inc./Pershing, LLC. All are FINRA member broker-dealers unaffiliated with The Company. The Company's 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 ("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, Exchange-Traded Funds and Notes as well as Exchange-Listed Securities with no transaction fees. Access 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 are part of the program. 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 always endeavors 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.

Clients are not under any obligation to initiate trades through any recommended broker. The Company does not receive fees or commissions from any of these arrangements.

### **Research Soft Dollars:**

Please note: The Company is in the process of phasing out any Soft Dollar credits in 2020. The primary reason is that TD Ameritrade and several other leading brokerage companies began offering free securities trades for listed securities. Therefore, Soft Dollars cannot be earned since commissions are no longer charged on securities trades. As a result, The Company will not receive any Soft Dollar credits. The verbiage listed below for Soft Dollars is only listed because Soft Dollar credits earned in 2019 may apply to research services in 2020.

In addition to a broker-dealer's ability to provide the "best execution" for their clients, The Company will 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 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 broker-dealer, The Company will generally determine, considering all 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 as well as services provided by TD

Ameritrade, Inc. In making this determination, The Company typically considers not only the transaction or transactions, and not only the value of brokerage and research services as well as products to a client, but also the value of those services and products in The Company's performance of its overall responsibilities to all its clients. In some cases, transaction fees charged by TD Ameritrade, Inc. for a 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 may be used for the benefit of the Client utilizing TD Ameritrade 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 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 initiate 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. Please note: As mentioned above, The Company will not likely receive any new Soft Dollar credits after April 1, 2020.

### **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 Direct Brokerage. By using Directed Brokerage, The Company may not be able to achieve the most favorable execution and this practice may be more costly.

### **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 is 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 (currently none are charged for listed securities) as may be applicable. The Company will strive to allocate combined orders as equitably as possible among their clients' accounts. When utilizing a batch trade, 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. It is important to note when executing trades across multiple custodians, transactions cannot be batched together, except at the same custodian. Therefore, at the present time, trades are rotated among custodians.

### **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.

### **Shareholders Service Group, Inc./Pershing, LLC:**

The Company will contact the trade desk to advise them of the error. The trade will be reversed and the Client will be made whole. Shareholders Service Group, Inc./Pershing, LLC will sell off the security in which the error occurred. There is a trade correction fee of \$10.00 assessed to The Company. Where a gain results, the gain will be posted to the Client's account. Where a loss results, The Company will be required to make the Client whole.

## **REVIEW OF ACCOUNTS:**

### **Investment Management:**

### **Periodic Reviews:**

Initial reviews of the assets are made and recommendations are provided to the Client. Thereafter, reviews of the portfolio(s) are conducted at least quarterly.

Portfolios, other than normal reviews, are reviewed at The Company's discretion including, 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.

## **Performance Reports:**

In addition to the statements and confirmations of transactions a client receives from The Company's preferred custodians, The Company will offer performance reporting either electronically or, if not available at the present time, in hard copy, on a quarterly basis to clients with at least \$250,000.00 under management and on a semi-annual basis to clients with less than \$250,000.00 under management unless otherwise agreed upon.

Clients who have less than \$100,000 under management will receive annual performance reports.

For those clients who utilize electronic reporting, performance reports will be available at their discretion.

## **Investment Consulting:**

### **Periodic Reviews:**

Initial reviews of the assets are made and recommendations are provided to the Client. Thereafter, reviews of the portfolio(s) are conducted at least quarterly.

For Clients' whose assets are held outside of The Company's preferred custodians, the investments will be reviewed whenever information is provided to The Company. If such assets can be monitored electronically through The Company's performance reporting software solutions, The Company will review those investments at least quarterly.

Other than normal reviews, portfolios 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.

Furthermore, for Clients' whose assets are held outside of The Company's preferred custodians, additional reviews will be triggered based on the circumstances mentioned in the previous paragraph whenever information is provided to The Company. If such assets can be monitored electronically through The Company's performance reporting software solutions, The Company will review those investments when it deems appropriate.

## **Performance Reports:**

For consulting arrangements, accounts held outside of The Company's Preferred Custodians cannot be reported upon unless direct data feeds are received by one of The Company's performance reporting software solutions.

The Company will offer performance reporting either electronically or, if not available at the present time, in hard copy, on a quarterly basis to clients with at least \$250,000.00 under management and on a semi-annual basis to clients with less than \$250,000.00 under management unless otherwise agreed upon.

Clients who have less than \$100,000 under management will receive annual performance reports.

For those clients who utilize electronic reporting, performance reports will be available at their discretion.

## **Investment Consulting For Employees, Employee Family Members And Friends:**

### **Periodic Reviews:**

Initial reviews of the assets are made and recommendations are provided to the Client. Thereafter, reviews of the portfolio(s) are conducted at least quarterly.

For Clients' whose assets are held outside of The Company's preferred custodians, the investments will be reviewed whenever information is provided to The Company. If such assets can be monitored electronically through The Company's performance reporting software solutions, The Company will review those investments at least quarterly.

Other than normal reviews, portfolios are reviewed at The Company's discretion including, 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.

Furthermore, for Clients' whose assets are held outside of The Company's preferred custodians, additional reviews will be triggered based on the circumstances mentioned in the previous paragraph whenever information is provided to The Company. If such assets can be monitored electronically through The Company's performance reporting software solutions, The Company will review those investments when it deems appropriate.

### **Performance Reports:**

For consulting arrangements for Employees, Employee Family Members and Friends' accounts held outside of The Company's Preferred Custodians cannot be reported upon unless direct data feeds are received by one of The Company's performance reporting software solutions.

The Company will only offer performance reporting electronically. For an additional fee, performance reports may be provided in hard copy.

For those clients who utilize electronic reporting, performance reports will be available at their discretion.

## **CLIENT REFERRALS AND OTHER COMPENSATION:**

### **Client Referrals To The Company By Solicitors:**

The Company may contract with other professionals/individuals to introduce The Company to that introducing individual clients and/or acquaintances to share advisory fees. All such introductions 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 has not filed as an investment advisor, if such notice filing is required.

If the above mentioned referring individual desires to receive a portion of The Company's fees as a result of referring their Client and/or acquaintance to The Company, the referring individual must have their client and/or acquaintance sign a Solicitor's Agreement which discloses the amount of the fee to be shared.

The Company will only share its advisory fee with any referring individual and/or company who are licensed as an investment advisor, provided that the payment of such fee is in compliance with Rule 206(4)-3 of the Advisers Act and applicable state laws.

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 referring individual agrees to perform these duties in a manner consistent with The Company's instructions, the Investment Advisers Act of 1940 and rules thereunder and applicable state law.

The Company will make a bonafide effort to ascertain that the referring individual 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.

### **Solicitor Referrals:**

### **Referrals To Other Professionals:**

The Company does not accept referral fees or any form of compensation from other professionals when its advisors refer a prospect or client to those other professionals.

### **Other Compensation:**

The Company does not accept any other form of compensation.

## **CUSTODY:**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record (or electronically). Upon receipt of

statements directly from the custodian, the Client is responsible for careful review of said documents for errors. The Company is not affiliated with any Custodian. The Custodians do not supervise The Company, its Advisors, or Activities.

## **INVESTMENT DISCRETION:**

### **Discretionary Authority for Trading:**

The Client delegates all discretionary authority for trading and all its powers regarding the investment assets to The Company. The Client appoints The Company as their “attorney and agent in fact” with full authority to buy, sell, or otherwise effect investment transactions of such investment assets on their behalf.

## **VOTING CLIENT SECURITIES:**

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

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

## **FINANCIAL INFORMATION:**

### **Fee Prepayment:**

Since The Company is an SEC Registered Investment Advisor and does not serve as a custodian for client funds or securities, nor does it require prepayment of fees of more than \$1,200.00 per client, six (6) months or more in advance, The Company is not required to provide an audited balance sheet to clients.

### **Bankruptcy:**

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

### **Government Loans:**

In the event of a catastrophic market decline, The Company applied for the following Federal Government loan programs to ensure its ability to protect The Company as an ongoing concern. The Company, without the proceeds of the Government loans, has substantial capital reserves to withstand any normal Bear Market.

### **The Economic Injury Disaster Loan (EIDL):**

The Small Business Administration (SBA)’s Economic Injury Disaster Loan (EIDL) is a loan of up to \$2 million with a maturity of up to 30 years that's designed to help carry businesses through tough times caused by a disaster, such as the COVID-19 pandemic.

On April 21, 2020, The Company received an Economic Injury Disaster Loan that will be forgivable for \$10,000.00. Since the loan balance is forgivable, there will not be any interest paid.

**The Paycheck Protection Program (PPP):**

The Small Business Administration (SBA) Paycheck Protection Program (“PPP”) authorizes up to \$349 billion in forgivable loans to small businesses to pay their employees during the COVID-19 crisis. All loan terms will be the same for everyone.

The loan amounts will be forgiven as long as:

The loan proceeds are used to cover payroll costs, and most mortgage interest, rent, and utility costs over the eight-week period after the loan is made; and

Employee and compensation levels are maintained.

Payroll costs are capped at \$100,000 on an annualized basis for each employee. Due to likely high subscription, it is anticipated that not more than 25.0% of the forgiven amount may be for non-payroll costs, such as rent.

Loan payments will be deferred for six months. The principal and interest, if not forgiven, will have to be paid over an ensuing 18-month period. The interest rate will be 1.0% annually.

On April 24, 2020, The Company received a loan amount of \$200,100.00 that may be partially or entirely forgivable from the Small Business Administration (SBA) as part of the Payroll Protection Program (PPP) to be used for emergency funding, if necessary. Since The Company received an Economic Injury Disaster Loan that will be forgivable for \$10,000.00, \$10,000.00 of the PPP Loan will not be forgivable.



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

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

### **Education and Business Standards:**

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

### **Professional Certifications:**

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

#### **Certified Financial Planner (CFP®):**

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

1. Bachelor's degree from an accredited college or university.
2. Completion of the financial planning education requirements established by the CFP® Board ([www.cfp.net](http://www.cfp.net)).
3. Successful completion of the CFP® Certification Exam.
4. Three-year qualifying full-time work experience.
5. Successfully pass the Candidate Fitness Standards and background check.

#### **Chartered Financial Analyst (CFA®):**

Chartered Financial Analysts are licensed by the CFA® Institute to use the CFA® mark. CFA® certification requirements include:

1. Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
2. Successful completion of all three exam levels of the CFA® Program.

3. Have 48 months of acceptable professional work experience in the investment decision-making process.
4. Fulfill society requirements, which vary by society. Unless upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by sponsors.
5. Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA® Institute.

### **Certified Public Accountant (CPA®):**

Certified Public Accountant is the statutory title of qualified accountants in the United States who have passed the Uniform Certified Public Accountant Examination and have met additional state education and experience requirements for certification as a CPA®. The designation "CPA® Inactive" or an equivalent phrase is permitted in many states. These individuals have previously met the requirements but in the interim, have not met their continuing professional education requirements. CPA® certification requirements include:

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

### **Professional Plan Consultant (PPC™):**

The Professional Plan Consultant (PPC™) designation signifies a commitment to education and service excellence in the qualified retirement plan industry. The 401(k) Service Training Program™ sets service standards in the retirement plan industry and imparts professionals not only with the knowledge, but the tools needed to meet and exceed those standards. PPC™ certification requirements include:

1. A successful candidate must have three years of financial industry sales, service, and/or support experience.
2. Successful completion of the 401(k) Service Training Program™ includes sitting for a 50-question, multiple choice examination and obtain a passing score of 80.0%.
3. A PPC™ candidate must attend either the instructor-led, multiple-day training session accredited by Robert Morris University or complete the online training program to gain a comprehensive understanding of the issues faced by plan sponsors, how to identify shortfalls in an employer-sponsored plan, and how to successfully address plan management issues.
4. On an ongoing basis, over a 12-month cycle, each PPC™ designee must complete six (6) continuing education hours in a format allowed by Financial Support Solutions.

## **Accredited Wealth Management Advisor<sup>SM</sup> (AWMA<sup>®</sup>):**

This designation will provide the candidate with advanced as well as practical knowledge about critical aspects of the financial advisory industry including: asset management, investment allocation and selection; investment performance and strategies; in addition to taxation of investment products. The course also includes training in investment for retirement, strategies for small business owners, and the management of deferred compensation plans.

Furthermore, instruction will cover insurance, estate planning, asset protection and income tax reduction issues. AWMA<sup>®</sup> certification requirements include:

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

## **NAPFA Registered Financial Advisor<sup>®</sup>:**

This designation is the top level of membership in the National Association of Personal Financial Advisors (NAPFA), a professional financial planning membership organization. NAPFA Registered Financial Advisor<sup>®</sup> requirements include:

1. Three years of financial planning experience, submit a sample financial plan and pass a peer review process
2. Possess a Bachelor's degree from an accredited institution
3. Must also possess either the Certified Financial Planning<sup>™</sup> designation awarded by the Certified Financial Planning Board of Standards, Inc., or the American Institute of Certified Public Accountants' Personal Financial Specialist (CPA<sup>®</sup>/PFS) credential
4. Must also adhere to NAPFA's Fiduciary Oath, Standards of Membership and Affiliation, and Bylaws
5. Must obtain Continuing Education Requirements of sixty (60) hours every two (2) years
6. Provide investment and/or financial advice on a strictly Fee-Only basis as defined by NAPFA, and continue to meet NAPFA's standards for strong character and adherence to the laws and regulation governing the profession.

## **Firm Advisory Staff:**

### **Louis P. Stanasolovich, CFP®**

Date of birth: February 5, 1957

#### Educational Background:

Bachelor of Science degree in Accounting from The Pennsylvania State University, 1979

CFP® designation obtained in 1984

#### Business Experience:

President and Founder, CEO, CCO, CIO, Legend Financial Advisors, Inc.® from January 1994 to Present

President and Founder, CEO, CCO, CIO, EmergingWealth Investment Management, Inc.® from October 2009 to Present

Disciplinary History: None

#### Other Business Activities:

100.0% Owner of Wealth Advisor Publishing, Inc.

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

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

Additional Compensation From Other Business Activities: None

#### Supervision:

Louis P. Stanasolovich's compliance related activities, including personal securities trading (for himself and his family) are supervised by James J. Holtzman, CFP®. Mr. Holtzman reviews Mr. Stanasolovich's investment advisory work through frequent office interactions as well as remote interactions.

James J. Holtzman, CFP®'s 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<sup>®</sup>, CPA<sup>®</sup> 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](http://www.savingforcollege.com)

Business Experience:

Wealth Advisor, Legend Financial Advisors, Inc.<sup>®</sup>, from December 2003 to Present.

Wealth Advisor, EmergingWealth Investment Management, Inc.<sup>®</sup>, from October 2009 to Present.

Shareholder of Legend Financial Advisors, Inc.<sup>®</sup> and EmergingWealth Investment Management, Inc.<sup>®</sup>

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

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

Chief Compliance Officer contact information:

(412) 635-9210      [legend@legend-financial.com](mailto:legend@legend-financial.com)

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None

**William T. Knight, AWMA<sup>®</sup>, PPC<sup>®</sup>**

Date of birth: July 21, 1987

Educational Background:

Bachelor of Science in Business Administration, University of Pittsburgh, 2010.

Passed Series 65 in 2010.

Received Accredited Wealth Management Advisor<sup>SM</sup> (AWMA<sup>®</sup>) designation in January, 2020.

Received Professional Plan Consultant<sup>®</sup> (PPC<sup>®</sup>) designation in April, 2020.

Business Experience:

Assistant Wealth Advisor, Legend Financial Advisors, Inc.<sup>®</sup> from February 2020 to Present

Assistant Wealth Advisor, EmergingWealth Investment Management, Inc.<sup>®</sup>, from February 2020 to Present

Finance Intern, Legend Financial Advisors, Inc.<sup>®</sup> from December 2007 to May 2010

William T. Knight, acted as a Sole Proprietorship for Various Enterprises, 2014 and ending in 2020.

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

William T. Knight's compliance related activities, including personal securities trading (for himself and his family) are supervised by the Chief Compliance Officer. Mr. Knight's work is reviewed through frequent office interactions as well as remote interactions.

Chief Compliance Officer contact information:

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

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None

**Alex G. Hendrickson, AWMA<sup>®</sup>, CFP<sup>®</sup>**

Date of birth: May 14, 1993

Educational Background:

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

Awarded Certified Financial Planner<sup>®</sup> designation, June, 2019.

Business Experience:

Assistant Wealth Advisor, Legend Financial Advisors, Inc.<sup>®</sup> from June 2017 to Present

Investment Coordinator, Legend Financial Advisors, Inc.<sup>®</sup> from June 2015 to June 2017

Assistant Wealth Advisor, EmergingWealth Investment Management, Inc.<sup>®</sup>, from June 2017 to Present

Investment Coordinator, EmergingWealth Investment Management, Inc.<sup>®</sup>, from June 2015 to June 2017

Finance Intern, Legend Financial Advisors, Inc.<sup>®</sup> from December 2013 to June 2015

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

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

Chief Compliance Officer contact information:

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

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None