

FORM ADV PART 2A

EMERGINGWEALTH INVESTMENT MANAGEMENT, INC.®

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CRD# 151471

March 31, 2023

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

This document provides information about the qualifications and business practices of EmergingWealth Investment Management, Inc.®. If you have any questions about the contents, please contact us at: (412) 635-9210. The information within has been filed with the United States Securities and Exchange Commission (SEC), and any required state securities authority. *

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

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

ITEM 2 - MATERIAL CHANGES:

Annual Update:

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

Material Changes After the Last Amendment:

The material changes in this brochure from the last annual updating amendment of EmergingWealth Investment Management, Inc. since March 25, 2022, are described below.

- We have updated our address and telephone number.
- We updated Item 4, 5, 15, and 16 with information regarding Pontera.
- We have amended Item 4 and Item 5 to clarify our consulting services and the fees associated for clients with held-away assets.
- In Item 4, we added more information about how we tailor our services to clients' needs.
- Updated Item 10 to disclose the Firm's relationship with our sister company Legend.
- Item 12 was updated with more information regarding the Firm's policies of selecting recommending broker dealers in order to achieve Best Execution.
- Item 12 was updated to remove the TD Institutional program and soft dollar disclosure.
- Item 12 was updated to state the Firm may accept directed brokerage in some instances.
- Item 15 was updated to better describe the Firm's limited custody.

Additional Copies:

To receive additional copies, please contact them by telephone at: (412) 635-9210 or by E- mail at: wealth@emergingwealth.com.

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ITEM 4 - ADVISORY BUSINESS:

Firm Description:

EmergingWealth Investment Management, Inc.® (“EmergingWealth” “the Firm”) is an investment adviser registered with the U.S. Securities Exchange Commission located in Pittsburgh, Pennsylvania. The Company was founded in July, 2009. The Company began offering Investment Management Services initially. On May 1, 2015, The Company began offering Investment Management Consulting Services. On January 1, 2019, The Company began offering Hourly Financial Planning Services.

As of February 2022, James Jude Holtzman and Christopher Kail are each 50% shareholders. James Holtzman is the Firm’s Chief Compliance Officer.

Types of Advisory Services:

The Firm offers a large variety of services, including portfolio management, financial planning, and general financial consulting to individuals, high net worth individuals, trusts, estates, non-profit organizations, businesses and medical practices. The Firm offers these services to clients or potential clients (“clients”).

The following section describes Firm services in detail. Refer to the description of each investment advisory services listed below for information on how EmergingWealth personalizes and tailors advisory services to advisory clients’ individual needs.

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 Firm’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.

Financial Planning Services:

The Firm offers, at times, financial planning services to individuals and families on an hourly basis at the Firm's stated billing rates. 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. Our financial planning recommendations are reviewed and updated periodically based on the client's needs and reasonable requests for such reviews. Implementation of the recommendations is at the discretion of the client.

Investment Advisory Services / Portfolio Management:

EmergingWealth offers the following investment services to individuals and families on a discretionary basis.

An analysis of the client's current family, financial, long-term objectives and the preparation of recommendations will be made by EmergingWealth. EmergingWealth 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. Our recommendations to investment advisory clients are reviewed and updated periodically based on the client's needs and reasonable requests for such reviews.

Discretionary Investment Management Services:

The Firm has engaged Legend Financial Advisors, Inc.[®] (hereafter “Legend” or the “Sub-Advisor”), a registered investment advisor related to EmergingWealth through common ownership and control, to directly manage all client portfolio assets as Sub-Advisor. All investment professionals of EmergingWealth are also associated persons of Legend.

Alternatively, EmergingWealth may manage securities portfolios directly as opposed to utilizing any Sub-Advisor.

EmergingWealth and/or the Sub-Advisor will manage each client’s securities portfolio (each has its own strategy) on an ongoing discretionary basis. After an initial discussion about the client’s comfort with risk, their individual financial goals and objectives as well as the client’s income tax situation to a degree, EmergingWealth 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 Firm/Sub-Advisor 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 Firm. The Firm will notify the Sub-Advisor of any changes. The Firm 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 Firm will be based upon the criteria mentioned above in addition to the client’s income tax circumstances, if applicable, as well as the type of portfolio they select.

EmergingWealth assesses clients’ current holdings and ensures alignment with both short- and long-term goals. The Firm performs ongoing reviews of investment performance and portfolio exposure to market conditions. Accordingly, the Firm is authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or sold without prior permission from the client for each transaction. Any and all trades are made in the best interest of the client as part of EmergingWealth’s fiduciary duty. However, risk is inherent to any investing strategy and model. Therefore, EmergingWealth does not guarantee any results or returns.

EmergingWealth offers ongoing portfolio management offerings tailored to the goals, objectives, time horizon and risk tolerance for each client. The investment offerings include active allocation, and management of assets through a series of equity income, equity growth, tax-efficient portfolios and

environment/social/governance (ESG) portfolios.

Prior to engaging EmergingWealth to provide any investment advisory services, EmergingWealth requires a written investment advisory agreement signed by the client prior to the engagement of any services. The agreement will outline services to which the client is entitled and fees the client will incur.

EmergingWealth is an asset-based fee investment management firm. The Firm does not receive commissions for purchasing or selling stocks, bonds, mutual funds, real estate investment trusts, or other commissioned products for clients. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted.

EmergingWealth does not act as a custodian of client assets. The client always maintains asset control. EmergingWealth places trades for clients under a limited power of attorney through qualified custodian/broker.

Investment Management Consulting / General Consulting Services:

This service 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 of the Firm's recommended custodians and/or with family member accounts. Furthermore, EmergingWealth will not have trading authority over held-away assets. EmergingWealth will advise the client as to how these assets are to be positioned.

EmergingWealth and or/ the Sub-Advisor manages securities portfolios for this investment service similar to the Firm's discretionary investment management services mentioned above. If the assets are held at custodians not recommended by the Firm, EmergingWealth will advise the client as to how to position those assets. Upon direction by EmergingWealth trade executions of such securities will need to be traded directly by the client or in conjunction with the client and EmergingWealth. It is solely the responsibility of the Client to reposition these assets in this type of situation although; the client can request EmergingWealth's assistance.

If the client opts to do so, the Firm may offer advice on held away assets that are reported by client to the Firm. To enable the Firm to provide advice accurately, the client must utilize additional software allowing held away asset valuation to be disclosed to the Firm in order for the Firm to provide the most informed advice to client. Under this arrangement, the advice given to the client is based on a point in time for which the information is provided to the Firm. The Client is responsible for placing trades in held away accounts for which we provide investment advice, but do not maintain trading authority. EmergingWealth will not provide portfolio management or execution services on these accounts.

Pontera

EmergingWealth uses a third-party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows EmergingWealth to avoid being considered to have custody of Client funds since EmergingWealth does not have direct access to Client log-in credentials to affect trades. EmergingWealth is not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, EmergingWealth will review the current account allocations. When deemed necessary, EmergingWealth will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly, and allocation changes will be made as deemed necessary.

Services Tailored to Clients' Needs

Services are provided based on a client's specific needs within the scope of the services provided as discussed above. A review of the information provided by the client regarding the client's current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information.

Services include management of fixed income, balanced and equity portfolios. Depending on the client's financial situation and goals, we may offer active, passive and tailor hybrid portfolio combinations. We may recommend portfolios that include common stocks, corporate, government and municipal bonds, preferred stocks, government agency obligations, money market instruments, mutual funds, exchange-traded funds and such other securities that we may select, unless expressly limited by the client's written direction or guidelines.

The advice is tailored to the individual needs of the client based on the investment objective chosen by the client in order to help assist them to meet their financial goals. Accounts are reviewed on a regular basis and

rebalanced as necessary according to each client's investment profile. If the client engages us for portfolio management services, we will generally accept discretionary authority to make determinations regarding the securities that are to be bought and sold, as well as the quantities of such securities. This means the client will not be asked in advance to review or approve each transaction. Such authority is subject to mutual agreement and must be granted by the client, in writing. In other instances, such as when clients engages us for consulting services, we may accept non-discretionary authority. In these instances, clients would need to sign off on any account activity prior to execution. Clients may impose restrictions on investing in certain securities or types of securities. Clients should notify EmergingWealth in writing, in advance, of any restrictions about their investment portfolios. Within client's guidelines, our portfolio managers will make decisions as to the nature and quantity of securities to be bought or sold. EmergingWealth reserves the right to not accept and/or terminate a client's account if it feels that the client-imposed restrictions would limit or prevent the Firm and/or the client from meeting and/or maintaining its objectives.

EmergingWealth will not assume any responsibility for the accuracy of the information provided by the client. The Firm is not obligated to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information. Under all circumstances, clients are responsible for promptly notifying the Firm in writing of any material changes to the client's financial situation, investment objectives, time horizon, tax status, risk tolerance or other material information that we may have relied upon in rendering our services.

Wrap Fee Programs:

EmergingWealth does not participate in any wrap fee programs.

Assets Under Management and Advisement:

As of December 31, 2022, the Firm manages approximately \$22,240,416 in discretionary assets and \$0 in non-discretionary assets. Additionally, as of December 31, 2022, the Firm consults upon approximately \$574,420 (assets under advisement).

ITEM 5 - FEES AND COMPENSATION

Compensation Description/Fee Billing:

EmergingWealth only receives fees from its clients. Generally, fees are not negotiable. However, in extremely rare circumstances, the Firm, 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 any service, a client may terminate their relationship at any time and receive a pro rata refund of any unearned fee. Similarly, any earned, unpaid fees will be due and payable upon termination.

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

When utilizing one of EmergingWealth's recommended custodians, fees from managing the account will be deducted directly from the account, unless otherwise agreed upon.

Financial Planning Fee Information:

Hourly Financial Planning Fee Schedule:

The Firm 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.

In special circumstances, EmergingWealth 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, EmergingWealth will require an additional deposit amount to continue services to the Client.

Discretionary Investment Management Fee Schedule:

The fiscal quarterly fee for each portfolio for discretionary investment management services will be charged as a percentage of assets under management, according to the following schedule:

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

Generally, EmergingWealth accepts clients with a minimum of \$300,000 in investable assets. This value may be waived at Firm discretion. Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000. EmergingWealth has the discretion to waive the portfolio minimum size.

This fee is calculated on a fiscal quarterly basis based on the average of the average daily value of the Client's investment portfolio or investment strategy for each day during the quarter. If the Client has multiple investment portfolios or investment strategies, the investment portfolios or investment strategies are aggregated together to calculate the fee. Discretionary investment management fees will be billed in arrears.

Investment Management Consulting / General Consulting Fee:

This service 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 of the Firm's recommended custodians and/or with family member accounts. Furthermore, EmergingWealth will not have trading authority over held-away assets. EmergingWealth will advise the client as to how these assets are to be positioned.

Clients are charged a single fee for these services and billed quarterly in advance. The fees are generally deducted from client accounts that are under the Firm's management or may be paid via check. Multiple portfolios can be included under this single fee.

If the client opts to do so, the Firm may offer advice on held away assets that are reported by client to the Firm. To enable the Firm to provide advice accurately, the client must utilize additional software allowing held away asset valuation to be disclosed to the Firm in order for the Firm to provide the most informed advice to client. Under this arrangement, the advice given to the client is based on a point in time for which the information is provided to the Firm. The Client is responsible for placing trades in held away accounts for which we provide investment advice, but do not maintain trading authority. EmergingWealth will not provide portfolio management or execution services on these accounts.

For held-away assets, clients will be charged based on a percentage of the assets the Firm is consulting on and according to the following schedule:

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

Generally, EmergingWealth accepts clients with a minimum of \$300,000 in investable assets. This value may be waived at Firm discretion. Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000. EmergingWealth has the discretion to waive the portfolio minimum size.

This fee is calculated on a fiscal quarterly basis based on the average of the average daily value of the Client's investment portfolio or investment strategy for each day during the quarter. If the Client has multiple investment portfolios or investment strategies, the investment portfolios or investment strategies are aggregated together to calculate the fee.

EmergingWealth may also provide both discretionary investment management consulting and financial planning services to one client. In this instance, fees shall be determined and billed according to information stated above in their respective sections.

Pontera

When advising individuals on employee benefit plans pursuant to ERISA, EmergingWealth will utilize a platform called Pontera. Pontera will directly charge EmergingWealth .25% AUM annually. EmergingWealth will cover the cost of the Pontera platform for the Firm's advisory clients utilizing this service. The fees of this service will not increase the fees charged to clients by EmergingWealth.

Other Advisory Fees:

Sub-Advisory Fee:

EmergingWealth has engaged Legend to directly manage all their clients' portfolios as the Sub-Advisor. The Firm will compensate the Sub-Advisor for its role as Sub-Advisor. There are no referral fee arrangements between the two entities.

Staff Time:

The Firm charges the following fees for staff time:

Wealth Advisor:	\$300.00 per hour
Senior Assistant Wealth Advisor:	\$150.00 per hour
Senior Investment Analyst (CFA®):	\$150.00 per hour
Assistant Investment Analyst:	\$100.00 per hour
Assistant Wealth Advisor:	\$100.00 per hour
Investment Coordinator:	\$100.00 per hour
Administrative:	\$75.00 per hour
Clerical:	\$25.00 per hour

OTHER FEES OR EXPENSES:

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

In addition to EmergingWealth'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.

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 EmergingWealth). 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, EmergingWealth 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:

EmergingWealth does not accept compensation for securities or other investment products.

Conflict Of Interest:

EmergingWealth 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. EmergingWealth has no obligation to these companies to recommend their products. EmergingWealth will only recommend these products when consistent with its fiduciary duty to the client.

Commissions And Other Sales Compensation:

EmergingWealth does not sell any commissioned products. EmergingWealth 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.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

EmergingWealth does not charge or accept performance-based fees or offer Side-By-Side Management services.

ITEM 7 - TYPES OF CLIENTS

EmergingWealth provides investment management services to individuals, trusts, estates, non-profit organizations, businesses and medical practices. The Firm also provides personal financial planning services to individuals. Client relationships vary in scope and length of service.

Minimum Account Size

Generally, EmergingWealth accepts clients with a minimum of \$300,000 in investable assets. This value may be waived at Firm discretion. Individual portfolios are subject to a minimum securities value for each portfolio of \$250,000. EmergingWealth has the discretion to waive the portfolio minimum size.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis/Investment Strategy:

The Firm has entered into a written Sub-Advisory agreement with Legend Financial Advisors, Inc.[®], (Legend), a registered investment advisor affiliated with EmergingWealth through common ownership and control, to provide investment management services to EmergingWealth client portfolio(s). As such, and pursuant to the terms of the written Sub-Advisory agreement, Legend will utilize the “Methods Of Analysis” and “Investment Strategies” indicated on Legend’s Firm Brochure Form ADV, Part 2A in managing The Company client portfolio(s).

Risk of Loss:

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee.

EmergingWealth does not provide any representation or guarantee that the financial goals of clients will be achieved. EmergingWealth 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 EmergingWealth’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:

General Risks. Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes.

Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions.

There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process but we often weigh professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by EmergingWealth plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by EmergingWealth may be affected by the risk that currency devaluations affect Client purchasing power.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers

and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

Legislative and Tax Risk. Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks maybe exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries.

In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Information Security Risk. We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with EmergingWealth may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their own tax advisers and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that our judgment or investment decisions on behalf of particular any account will necessarily produce the intended results.

Our judgment may prove to be incorrect, and an account might not achieve her investment objectives. In addition, it is possible that we may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software. EmergingWealth and its representatives are not responsible to any account for losses unless caused by EmergingWealth breaching our fiduciary duty.

Dependence on Key Employees. An accounts success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could

adversely impact the ability to achieve such investment goals and objectives of the account.

ITEM 9 - DISCIPLINARY INFORMATION

Criminal Or Civil Action:

EmergingWealth 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:

EmergingWealth 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:

EmergingWealth and its employees have not ever been involved in any Self-Regulatory Organization (SRO) violations events.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS:

Registration as a Broker/Dealer or Broker/Dealer Representative:

EmergingWealth is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representative

Registration as a Future Commission merchant, Commodity Pool Operator:

EmergingWealth and its management persons are not registered and do not have application pending to register, as a futures commission merchant, commodity pool operator/advisor.

Relationships Material to this Advisory Business and Possible Conflicts of Interest

As noted below, EmergingWealth obtains Sub-Advisory services from its affiliated SEC registered investment advisor, Legend Financial Advisors, Inc.[®], (SEC File No. 801-44704). EmergingWealth, in addition to being commonly owned, rents the services of Legend's non-advisory employees, technology, accounting and office space. Legend has the option to waive its sub-advisory fee to EmergingWealth. This could change at any point in time.

Recommendation/Selection of Other Investment Advisors:

EmergingWealth obtains Sub-Advisory services from its affiliated SEC registered investment advisor, Legend Financial Advisors, Inc.[®], (SEC File No. 801-44704). Both firms, EmergingWealth and Legend, have overlapping and/or common ownership. EmergingWealth shares office space. Legend Financial Advisors, Inc.[®]'s employees contribute services to EmergingWealth Investment Management, Inc.[®]'s business efforts for hourly fees.

Legend Financial Advisors, Inc.[®] (SEC registered investment adviser, file number 801- 44704) and EmergingWealth Investment Management, Inc.[®] (SEC registered investment adviser, file number 801-70731) have overlapping and/or common ownership with Legend. EmergingWealth shares office space and rents employees based on an hourly billing rate.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics:

EmergingWealth has adopted a Code of Ethics which sets forth high ethical standards of business conduct that EmergingWealth requires of its Chief Compliance Officer and sole employee, including compliance with applicable federal securities laws. The Firm'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 Firm's CCO. Among other things, the Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. The Code of Ethics also includes oversight, enforcement and recordkeeping provisions. A copy of the Code of Ethics is available to EmergingWealth's advisory clients or prospective clients upon request.

Participation or Interest in Client Transactions:

The Firm does not have any employees. It retains its Sub-Advisor's services.

Personal Trading:

The Firm does not have any employees. It retains its Sub-Advisor's services.

ITEM 12 - BROKERAGE PRACTICES

Selection and Recommendation of Broker-Dealers/Custodians:

EmergingWealth has a duty to select brokers, dealers and other trading venues that provide best execution for clients. The duty of best execution requires an investment adviser to seek to execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances, taking into account all relevant factors. The lowest possible commission, while very important, is not the only consideration.

It is the policy of the Firm to seek best execution in all portfolio trading activities for all investment disciplines and products, regardless of whether commissions are charged. This applies to trading in any instrument, security, or contract including equities, bonds, and forward or derivative contracts.

The standards and procedures governing best execution are set forth in several written policies. Generally, to achieve best execution, EmergingWealth considers the following factors, without limitation, in selecting brokers and intermediaries:

- Execution capability;
- Order size and market depth;
- Availability of competing markets and liquidity;
- Trading characteristics of the security;
- Availability of accurate information comparing markets;
- Quantity and quality of research received from the broker dealer;
- Financial responsibility of the broker-dealer;

- Confidentiality;
- Reputation and integrity;
- Responsiveness;
- Recordkeeping;
- Ability and willingness to commit capital;
- Available technology; and
- Ability to address current market conditions.

EmergingWealth will evaluate the execution, performance, and risk profile of the broker-dealers it intends to use at least quarterly. EmergingWealth will recommend that all clients of our investment supervisory services engage the custodial and trade execution services of EmergingWealth's broker dealers. The broker dealers may charge their own trade fees related to transactions. The client may incur account maintenance and/or money movement charges directly from the broker dealers.

That being said, all investment management, investment consulting, or sub-advisory clients are free to select any broker-dealer/custodian of his or her choice. However, EmergingWealth 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 EmergingWealth's recommended broker-dealers/custodians. Emerging is not affiliated with any of the brokerage firms. The brokers do not supervise EmergingWealth, 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, EmergingWealth 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 EmergingWealth. EmergingWealth's recommendation of these firms is consistent with EmergingWealth's fiduciary duty to the client.

Clients are not under any obligation to initiate trades through any recommended broker.

EmergingWealth does not receive fees or commissions from any of these arrangements.

Research and Other Soft Dollar Benefits:

This item does not apply to the Firm.

Brokerage for Client Referrals:

EmergingWealth does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

Directed Brokerage:

With some exceptions, EmergingWealth strongly discourages a client to engage in directed brokerage. When clients direct brokerage, EmergingWealth may not be able to achieve the most favorable execution and this practice may be more costly.

The exceptions are, most commonly, EmergingWealth clients that utilize the third-party Pontera platform to facilitate management of held away assets or EmergingWealth clients that maintain their assets with a custodian not recommended by EmergingWealth, but engages EmergingWealth for consulting services.

As stated in previous sections, clients have the option to purchase investment products that EmergingWealth recommends through other broker-dealers or agents. However, EmergingWealth reserves the right to terminate its contract with the client if the custodian that the client chooses does not offer services competitive with EmergingWealth's recommended custodians from either a service or pricing standpoint.

Order Aggregation:

Investment transactions of traded securities for each client generally will be effected independently, unless Legend/Sub-Advisor decides to purchase or sell the same investments for several clients at approximately the same time. Legend may, but is not obligated to, combine (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. Legend will strive to allocate combined orders as equitably as possible among their clients' accounts. When utilizing a block 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.

Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of Adviser's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day.

Trade Error Disclosure for Various Custodians:

TD Ameritrade Institutional:

It is EmergingWealth's policy and practice to seek to identify and correct trade errors in client accounts without ultimately disadvantaging the client. Should EmergingWealth discover a trade error attributable to the action or inaction of EmergingWealth or its staff, it is EmergingWealth'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 EmergingWealth 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 EmergingWealth's choice.

Shareholders Service Group, Inc./Pershing, LLC:

EmergingWealth 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 EmergingWealth. Where a gain results, the gain will be posted to the client's account. Where a loss results, EmergingWealth will be required to make the client whole.

ITEM 13 - REVIEW OF ACCOUNTS

Periodic Reviews:

Initial reviews of investment management assets are made and recommendations are provided to the client. While portfolios are monitored on an ongoing basis, formal reviews of the portfolio(s) are conducted at least quarterly. Reviewers are members of the Sub -Advisor's Investment Committee.

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

All investment advisory clients are advised that it remains their responsibility to advise EmergingWealth of any changes in their investment objectives and/or financial situation and are encouraged to discuss their needs, goals, and objectives with EmergingWealth and to keep us informed of any changes thereto. The Firm shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Intermittent Review Factors:

Portfolios, other than normal reviews, are reviewed at EmergingWealth'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 EmergingWealth's recommended custodians, additional reviews will be triggered based on the circumstances mentioned in the previous paragraph whenever information is provided to EmergingWealth. If such assets can be monitored electronically through EmergingWealth's performance reporting software solutions, EmergingWealth will review those investments when it deems appropriate.

Reports:

In addition to the statements and confirmations of transactions a client receives from EmergingWealth's recommended custodians, EmergingWealth will offer performance reporting and fee invoices either electronically or, if not available at the present time, in hard copy, on a quarterly basis.

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

For consulting arrangements, accounts held outside of EmergingWealth's recommended custodians cannot be reported upon unless direct data feeds are received by one of EmergingWealth's performance reporting software solutions.

CLIENT REFERRALS AND OTHER COMPENSATION

Client Referrals:

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

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

Other Compensation:

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

Legend does not accept any other form of compensation.

ITEM 15 - CUSTODY:

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them.

EmergingWealth does not have direct custody of any client funds and/or securities. EmergingWealth will not maintain physical possession of client funds and securities. Instead, clients' funds and securities are held by a qualified custodian. While EmergingWealth does not have physical custody of client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client's account application.

For clients that have their fees deducted directly from their account(s) or that have provided EmergingWealth with discretion as to amount and timing of disbursements pursuant to a standing letter of authorization to disburse funds from their account(s), EmergingWealth will typically be deemed to have limited custody over such clients' funds or securities pursuant to the SEC's custody rule and subsequent guidance thereto. At no time will EmergingWealth accept full custody of client funds or securities in the capacity of a custodial broker-dealer, and at all times client accounts will be held by a third-party qualified custodian as described in Item 12, above.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does

not calculate the amount of the fee to be deducted and does not verify the accuracy of EmergingWealth's advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation. Clients should contact EmergingWealth directly if they believe that there may be an error in their statement.

Certain client accounts subject to EmergingWealth's services may be held at a custodian that is not directly accessible by EmergingWealth ("qualified accounts"). EmergingWealth may, but is not required to, manage these qualified accounts using the Pontera, allowing EmergingWealth to view and manage these assets. To manage qualified assets, you must agree to the Pontera End User Terms and Conditions and Privacy Policy and must further agree to keep EmergingWealth apprised of any changes to your usernames and passwords for qualified accounts so that EmergingWealth can promptly update your credentials using the Pontera system. You also must agree to promptly address any requests to update its login credentials when requested by the Pontera system. In the event of any delay by you to update your login credentials, you must acknowledge in your agreement that EmergingWealth will not have access to view or manage your qualified account, which may result in investment losses. EmergingWealth will not be responsible for any losses arising from your delays in updating its login credentials through the Pontera system. EmergingWealth will be under no obligation to credit any fees for valuations made in good faith during periods when EmergingWealth did not have access to any qualified account in calculating its fees under the investment management agreement.

For EmergingWealth clients that maintain their assets at custodian's other than EmergingWealth's recommended custodians and utilize EmergingWealth's consulting services, EmergingWealth may also utilize Pontera with non-qualified accounts. In these instances, EmergingWealth accepts directed brokerage as stated in earlier sections.

ITEM 16 - INVESTMENT DISCRETION:

The client delegates all discretionary authority for trading and all its powers regarding the investment assets to the Firm and/or its Sub-Advisor. The client appoints EmergingWealth and/or its Sub-Advisor as their “attorney and agent in fact” with full authority to buy, sell, or otherwise effect investment transactions on such investment assets on their behalf.

This authority will be granted by clients upon completion of EmergingWealth’s advisory agreements. This authority allows EmergingWealth and its affiliates to implement investment decisions without prior consultation with the client. Such investment decisions are made in the client’s best interest and in accordance with the client’s investment objectives. Other than agreed upon management fees due to EmergingWealth, this discretionary authority does not grant the Firm the authority to have custody of any assets in the client’s account or to direct the delivery of any securities or the payment of any funds held in the account to EmergingWealth. The discretionary authority granted by the client to the Firm does not allow the Firm to direct the disposition of such securities or funds to anyone except the account holder.

These discretionary purchases and/or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Adviser in an Investment Policy Statement.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client’s execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by the Firm will be in accordance with each client’s investment objectives and goals.

The Client must understand that gains and losses are realized by discretionary activity and that these are taxable events, and that the client has authorized such activity in granting discretion. While some sensitivity to taxation is possible with discretion, if the client requires control of the taxable events, a non-discretionary approach is needed and therefore recommended, and this would require that the client’s investment contract indicate the account is non-discretionary.

Pontera

Our Firm will also provide service for accounts not directly held in our custody, but where we do have discretion, and may leverage an Order Management System (Pontera) to implement asset allocation and opportunistic rebalancing strategies on behalf of the client. Pontera is a clerical service that facilitates orders from EmergingWealth to client accounts not held in our custody, for example, employer sponsored retirement plans like 401(k)s. This service does not facilitate account billing and fees are paid directly by EmergingWealth, not the client. The accounts that will utilize these services will be primarily 401(k) accounts, HSAs, 403bs, Thrift Savings Plan (TSP), and other assets that EmergingWealth does not have custody of. EmergingWealth and/or the Sub-Advisor will regularly review, rebalance, and implement our strategies using different tools as necessary.

We regularly review the available investment options in these accounts, monitor them, and rebalance and implement our strategies in the same way we do other accounts, though using different tools as necessary. Clients who chose to participate in this program will be notified when our firm places a trade through Pontera implementing any and all changes to your account. The fees charged in these situations are the same as described in the table under “Fees and Compensation.” Fees are paid

separately on the management of these “held away” assets. Fees for management of these accounts are paid by EmergingWealth from a taxable brokerage account, or via ACH bank account. These fees may not be debited from the client account directly. Suitability documentation will be held with the Plan Custodian and this documentation cannot be altered by EmergingWealth.

ITEM 17 - VOTING CLIENT SECURITIES:

The Firm does not perform proxy voting services on the client’s behalf. Clients are encouraged to read through the information provided with the proxy voting documents and to make a determination based on the information provided. Upon the client’s request, Firm representatives may provide limited clarifications of the issues presented in the proxy voting materials based on his or her understanding of issues presented in the proxy voting materials. However, clients have the ultimate responsibility for making all proxy voting decisions.

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

ITEM 18 - FINANCIAL INFORMATION:

Balance Sheet Requirement

EmergingWealth is not the qualified custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, six (6) months or more in advance.

Financial Condition

EmergingWealth does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients

Bankruptcy Petition

EmergingWealth has never been the subject of a bankruptcy petition.

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

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

Education and Business Standards:

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

Professional Certifications:

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

Certified Financial Planner (CFP®):

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

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

Chartered Financial Analyst (CFA®):

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

1. Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
2. Successful completion of all three exam levels of the CFA® Program.
3. Have 48 months of acceptable professional work experience in the investment decision-making process.

4. Fulfill society requirements, which vary by society. Unless upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by sponsors.
5. Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA® Institute.

Certified Public Accountant (CPA®):

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

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

Professional Plan Consultant (PPC™):

The Professional Plan Consultant (PPC™) designation signifies a commitment to education and service excellence in the qualified 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 AdvisorSM (AWMA®):

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

compensation plans. Furthermore, instruction will cover insurance, estate planning, asset protection and income tax reduction issues. AWMA® certification requirements include:

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

NAPFA Registered Financial Advisor®:

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

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

Firm Advisory Staff:

James J. Holtzman CFP®

James J. Holtzman, CFP®, CPA®

Date of birth: January 25, 1974

Educational Background:

Bachelor of Science in Administration and Management, La Roche College, 1996.

Bachelor of Science in Accounting, La Roche College, 1996.

Registered Section 529 Plan Consultant through the www.savingforcollege.com.

Business Experience:

Wealth Advisor, Legend Financial Advisors, Inc.®, from December 2003 to Present.

Wealth Advisor, EmergingWealth Investment Management, Inc.®, from October 2009 to Present.

Shareholder of Legend Financial Advisors, Inc.® and EmergingWealth Investment Management, Inc.®

Disciplinary History: None

Other Business Activities: None

Additional Compensation: None

Supervision:

As the Chief Compliance Officer of EmergingWealth Investment Management Inc., James J. Holtzman supervises all duties and activities of the firm. James J. Holtzman's contact information is on the cover page of this disclosure document. James J. Holtzman adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual

Chief Compliance Officer contact information:

(866) 280-4896

legend@legend-financial.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceedings: None

Bankruptcy Petition: None