



Legado Wealth Management LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 30, 2023

This Brochure provides information about the qualifications and business practices of Legado Wealth Management LLC ("Legado" or the "Firm"). If you have any questions about the contents of this Brochure, please contact Mr. Oscar David Flores de Valgaz, Chief Compliance Officer, by phone (212) 697-3420 or email compliance@legadowealth.com. The information in this brochure has not been approved or verified by the U. S. Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Legado Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or our CRD # 305263.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of LWM.

LWM believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. LWM encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

At the time of filing this form ADV Part 2A (the "Brochure") which is dated March 30, 2023, there are no material updates to disclose.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of LWM.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD # 305263. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (212) 697-3420 or by email at compliance@legadowealth.com.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Services	4
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	4
D. Wrap Fee Programs.....	4
E. Assets Under Management.....	5
Item 5 – Fees and Compensation	5
A. Fees for Advisory Services.....	5
B. Fee Billing	5
C. Other Fees and Expenses	6
D. Advance Payment of Fees and Termination.....	6
E. Compensation for Sales of Securities.....	6
Item 6 – Performance-Based Fees and Side-By-Side Management	6
Item 7 – Types of Clients	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	7
A. Methods of Analysis	7
B. Risk of Loss.....	7
Item 9 – Disciplinary Information	8
Item 10 – Other Financial Industry Activities and Affiliations	8
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	8
A. Code of Ethics.....	8
B. Personal Trading with Material Interest.....	8
C. Personal Trading in Same Securities as Clients	8
D. Personal Trading at Same Time as Client.....	9
Item 12 – Brokerage Practices	9
A. Recommendation of Custodian[s]	9
B. Aggregating and Allocating Trades	9
Item 13 – Review of Accounts	10
A. Frequency of Reviews.....	10
B. Causes for Reviews	10
C. Review Reports.....	10
Item 14 - Client Referrals and Other Compensation	10
A. Compensation Received by LWM	10
B. Client Referrals from Solicitors	10
Item 15 – Custody	10
Item 16 – Investment Discretion	11
Item 17 – Voting Client Securities	11
Item 18 – Financial Information	11
Item 19 – Requirements for State Registered Advisors	11
A. Educational Background and Business Experience of Principal Officer	11
B. Other Business Activities of Principal Officer.....	11
C. Performance Fee Calculations	11
D. Disciplinary Information.....	11
E. Material Relationships with Issuers of Securities.....	12
Form ADV Part 2B – Brochure Supplement	13
Privacy Policy	16

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Item 4 – Advisory Services

A. Firm Information

Legado Wealth Management LLC (“LWM” or the “Advisor”) is a registered investment advisor located in the State of New York. LWM is organized as a limited liability company (“LLC”) under the laws of New York. LWM was founded in September 2019 and is owned and operated by Managing Director and Chief Compliance Officer, Oscar D. Flores de Valgaz. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by LWM.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

B. Advisory Services Offered

LWM Clients may engage Legado to manage all or a portion of their assets on a discretionary or nondiscretionary basis or to provide investment advice on a consulting non-binding basis. Legado and its representatives provide advice that is tailored to the individual needs of the client based on the financial information and the investment objective(s) communicated by the client. Clients may impose restrictions on investing in certain securities or groups of securities by notifying the firm or representative in writing (including in the Account Application).

LWM's investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client, due to market conditions or other factors.

LWM evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. LWM may recommend, on occasion, redistributing investment allocations to diversify the portfolio. LWM may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. LWM may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will LWM accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment management agreement. For additional information, please see item 12 – Brokerage Practices and Item 15 – Custody.

C. Client Account Management

Prior to engaging LWM to provide investment management services, each Client is required to enter into an investment management agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – LWM, in connection with the Client, will develop an investment strategy for the Client that is targeted to achieve the Client's objectives.
- Portfolio Construction – LWM will implement a customized strategy for the Client. Clients may impose reasonable restrictions on their account(s), subject to the review and approval by LWM.

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- Investment Management and Supervision – LWM will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

LWM does not manage or place Client assets into a wrap fee program.

E. Assets Under Management

As of December 31, 2022, LWM manages \$13,064,624 in Client assets, all of which are on a discretionary basis. \$34,617,611 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment management agreement that details the responsibilities of LWM and the Client.

A. Fees for Advisory Services

Investment management fees are paid quarterly or monthly, in arrears or advance of each calendar quarter or month, pursuant to the terms of the investment management agreement. Investment management fees are based on the market value of assets under management at the end of the quarter. Investment management fees are at an annual rate of up to 2.00% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Institutional Clients may be offered a lower fee than individual investors.

The investment management fee in the first month or quarter of service is prorated from the inception date of the account to the end of the first month or quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by LWM will be independently valued by the Custodian. LWM will not have the authority or responsibility to value portfolio securities.

For Institutional Clients, there are two methods of obtaining LWM's services. The Institutional Client may engage LWM as an investment sub-advisor to the Institutional Client or refer its investors to LWM in a Solicitor relationship. Please See Item 14.

Investment Consulting and Financial Planning Services

LWM offers financial planning and consulting services on either an hourly basis or a fixed engagement. Hourly engagements are billed at the rate of \$250 per hour, based on the complexity of the services to be provided and the experience of the individual providing services. Fixed fee engagements are negotiated based on the expected number of hours to complete the engagement at the Adviser's hourly rate. Fees may be negotiable at the sole discretion of the adviser, depending on the nature and complexity of the services provided. An estimate for total hours and/or costs will be provided to the client prior to engaging for these services. The Adviser's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Adviser shall not receive any portion of these commissions, fees, and costs. For certain Clients, financial planning services are included in the investment advisory fee.

B. Fee Billing

Investment management fees will be calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor may send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective month-end or quarter-end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) or quarterly rate (annual rate divided by 4) to the total assets under management with LWM at the end of the month or quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment management fee. In addition, upon

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request the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting LWM to be paid directly from their accounts held by the Custodian as part of the investment management agreement and separate account forms provided by the Custodian.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than LWM, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The investment management fee charged by LWM is separate and distinct from these custody and execution fees.

In addition, all fees paid to LWM for investment management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of LWM, but would not receive the services provided by LWM which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by LWM to fully understand the total fees to be paid. Please see Item 12 – Brokerage Practices.

D. Payment of Fees and Termination

LWM is compensated for its services in arrears or in advance of the month or quarter in which investment management services are rendered. Either party may terminate the investment management agreement with LWM, at any time, by providing advance written notice to the other party. The Client may also terminate the investment management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment management fees from the effective date of termination to the end of the quarter. The Client's investment management agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

LWM does not buy or sell securities for commissions and does not receive any compensation for securities transactions in any Client account, other than the Investment Management Fees noted above.

Item 6 – Performance-Based Fees and Side-By-Side Management

LWM does not charge performance-based fees for its investment management services. The fees charged by LWM are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

LWM does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

LWM offers investment management services to individual and institutional investors, including other financial professionals. The amount of each type of Client is available on LWM's Form ADV Part 1. These amounts may change over time and are updated at least annually by the Advisor. LWM generally does not impose a minimum size for establishing a relationship but will impose minimum for various investment strategies for effective implementation.

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Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

LWM primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from LWM are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The

Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

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

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. LWM will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategy:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

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Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Clients should only have a portion of their assets in these investments.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving LWM or Mr. Flores de Valgaz. LWM values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD # 305263.

Item 10 – Other Financial Industry Activities and Affiliations

The primary business of LWM and Mr. Flores de Valgaz is to provide investment management services to its Clients. Mr. Flores de Valgaz is a licensed insurance professional. Implementations of insurance recommendations are separate and apart from his role with Legado. As an insurance professional, Mr. Flores de Valgaz may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Flores de Valgaz is not required to recommend the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies and clients are under no obligation to implement any recommendations made by Mr. Flores de Valgaz.

Mr. Flores de Valgaz is a principal of Legado Consulting LLC. Legado Consulting LLC is a compliance and business consulting firm, rendering services to businesses and other RIAs on operational and compliance needs. Mr. Flores de Valgaz spends no significant time of the trading day in this business.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

LWM has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with LWM (herein our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. LWM and its personnel owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of LWM associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (212) 697-3420.

B. Personal Trading with Material Interest

LWM allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. LWM does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. LWM does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

LWM allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material

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non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of LWM may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by conducting a coordinated review of personal accounts and the accounts of the Clients. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While LWM allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will LWM, or any associated person of LWM, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

LWM does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize LWM to direct trades to the Custodian as agreed in the investment management agreement. Further, LWM does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where LWM does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by LWM. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. LWM may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices. LWM will generally recommend that Clients establish their accounts at Charles Schwab & Co. ("Schwab") an unaffiliated SEC-registered broker-dealer and FINRA member. The Advisor maintains an institutional relationship with Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **LWM does not participate in soft dollar programs sponsored or offered by any broker-dealer. However, the Advisor does receive certain economic benefits from Interactive Brokers. Please see Item 14.**

2. Brokerage Referrals - LWM does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where LWM will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). LWM will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. LWM will execute its transactions through the Custodian as directed by the Client. LWM may aggregate orders in a block trade or trades when securities are purchased or

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sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Investments in Client accounts are monitored on a regular and continuous basis by Mr. Flores de Valgaz, Managing Director/CCO of LWM. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify LWM if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by LWM

LWM is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. LWM does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. LWM may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, LWM may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform

The Advisor has established an institutional relationship with Schwab to assist the Advisor in managing Client account[s]. Access to the Schwab Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Schwab: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Item 15 – Custody

LWM does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the

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Custodian to retain their funds and securities and direct LWM to utilize the Custodian for the Client's security transactions. LWM encourages Clients to review statements provided by the account Custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 – Investment Discretion

LWM generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by LWM. 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 management agreement containing all applicable limitations to such authority. All discretionary trades made by LWM will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

LWM does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither LWM, nor Mr. Flores de Valgaz, has any adverse financial situations that would reasonably impair the ability of LWM to meet all obligations to its Clients. Neither LWM, nor Mr. Flores de Valgaz, has been subject to a bankruptcy or financial compromise. LWM is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

The Managing Director/CCO of LWM is Oscar D. Flores de Valgaz. Information regarding the formal education and background of Mr. Flores de Valgaz is included his Form ADV Part 2B below.

B. Other Business Activities of Principal Officer

Mr. Flores de Valgaz is primarily dedicated to the investment advisory activities of LWM's Clients. Mr. Flores de Valgaz's other business activities can be found on the Supplemental ADV Part 2B form.

C. Performance Fee Calculations

LWM does not charge performance-based fees for its investment management services. The fees charged by LWM are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding LWM or Mr. Flores de Valgaz.

Neither LWM nor Flores de Valgaz has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against LWM or Mr. Flores de Valgaz.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding LWM or Mr. Flores de Valgaz.***

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E. Material Relationships with Issuers of Securities

Neither LWM nor Mr. Flores de Valgaz has any relationships or arrangements with issuers of securities.



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Telephone: (212) 697-3420
E-mail: odfdv@legadowealth.com

List of Supervised Persons: Oscar David Flores de Valgaz, Managing Member/Chief Compliance Officer

his brochure supplement provides information about the supervised persons listed below that supplement the Legado Wealth Management LLC ("Legado" or "the Advisor") Disclosure Brochure. You should have received a copy of that brochure. Please contact Oscar David Flores de Valgaz, Chief Compliance Officer, if you did not receive Legado's brochure or if you have any questions about the contents of this supplement by email at compliance@legadowealth.com.

Additional information about the above supervised persons is available on the SEC's website at www.adviserinfo.sec.gov

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Phone: (702) 850-6200

Item 2 – Educational Background and Business Experience

Mr. Oscar David Flores de Valgaz is the owner and Principal of Legado Wealth Management LLC. Mr. Flores de Valgaz was born in 1974 and earned a B.S. in Interdisciplinary Studies from Nyack College in 1998. His professional experience is as follows:

Professional Experience:

07/2019 - Present: Legado Wealth Management LLC - Financial Advisor

06/2017 - 07/2021: Union Capital Group - Financial Advisor

07/2016 - 06/2017: InSight Securities - Financial Advisor

05/2015 - 07/2016: Lebenthal & Co., LLC - Financial Advisor

05/2012 - 06/2015: Forefront Capital Markets LLC - Financial Advisor

10/2010 - 05/2012: Maxim Group LLC - Financial Advisor

01/2006 - 07/2010: Morgan Stanley Smith Barney and predecessors - Financial Advisor

06/2002 - 01/2006: Merrill Lynch - Associate

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Flores de Valgaz. Mr. Flores de Valgaz has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Flores de Valgaz.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Flores de Valgaz.***

However, we do encourage you to independently view the background of Mr. Flores de Valgaz on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4598645.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Flores de Valgaz is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from his role with Legado. As an insurance professional, Mr. Flores de Valgaz may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Flores de Valgaz is not obligated to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Flores de Valgaz.

Consulting Services

Mr. Flores de Valgaz is a principal of Legado Consulting LLC. Legado Consulting LLC is a compliance and business consulting firm, rendering services to businesses and other RIAs on operational and compliance needs. Mr. Flores de Valgaz spends no significant time of the trading day in this business.

Board Member

Mr. Flores de Valgaz, in his separate capacity, sits on the board of Renew City Church, a charitable organization located in Bayside, NY. Mr. Flores de Valgaz is responsible for providing strategic oversight along with other

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board members on the initiatives of the organization. Mr. Flores de Valgaz is not compensated and spends less than 5 hours per month in this capacity.

Item 5 – Additional Compensation

Mr. Flores de Valgaz has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Flores de Valgaz serves as the Managing Director and Chief Compliance Officer of LWM. Mr. Flores de Valgaz can be reached at (212) 697-3420.

LWM has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of LWM. Further, LWM is subject to regulatory oversight by various agencies. These agencies require registration by LWM and its Supervised Persons. As a registered entity, LWM is subject to examinations by regulators, which may be announced or unannounced. LWM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Mr. Flores de Valgaz does not have any additional information to disclose.

Privacy Policy

Effective: March 30, 2023

Our Commitment to You

Legado Wealth Management LLC ("LWM" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. LWM (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

LWM does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes LWM does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where LWM or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients LWM does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (212) 697-3420.