



Form CRS Customer Relationship Summary, April 13, 2023

Legacy Financial Group, LLC is registered with the Securities and Exchange Commission (SEC) as an Investment Adviser. Brokerage and investment advisory services and fees differ, and it is important for you as a retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

#### ***What investment services and advice can you provide me?***

We offer investment advisory services to retail investors, including investment management, financial planning, consulting services, financial education services, retirement planning services, pension consulting services, divorce planning and selection of third-party money managers. We use an active, diversified investment approach tailored to the individual needs of our clients by developing an investment policy statement with each client. Investment management is provided on a discretionary basis. Discretionary means the trading activity with your account is entered by us without receiving prior authorization for each trade. For nondiscretionary accounts, you make the ultimate decision regarding the purchase and/or sale of investments. You may impose limitations in the form of specific constraints on any areas of discretion with our written acknowledgement. We monitor your account at least quarterly. We will offer you advice on a regular basis and contact you at least annually to discuss your portfolio. We do not have a minimum account size and we do not restrict our advice to limited types of products or investments.

We provide financial planning by gathering enough data to perform an analysis of client liabilities, cash flow, net worth, and tax assessments. We then assist you with formalizing your goals and plotting your investment timeline. Written financial plans or financial consultations usually include general recommendations for a course of activity or specific actions to be taken by you. We also provide education services about general investment principles as presentations to employees at the request of an employer. We provide pension consulting services to employer plan sponsors, which consist of assistance in establishing, monitoring and reviewing the plan. Financial professionals may recommend third-party money managers to you based on your financial needs. These managers offer a variety of programs and services that include separate account portfolio management programs and asset allocation programs.

**For additional information**, please see our Form ADV Part 2A brochure Items 4, which is available online at <https://adviserinfo.sec.gov/firm/summary/154927>

#### **Conversation Starters. Questions to Ask Us:**

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

#### ***What fees will I pay?***

We offer our services on a fee basis, which may include hourly and/or fixed fees, as well as fees based upon assets under management. We provide investment management services for an annual fee, which is negotiable and will not exceed 1.20% for investment management services. The fees charged are based on the value of the cash and investments in your account(s) that we manage. Our fees are prorated and charged quarterly, in advance, and automatically deducted from your account, which will reduce the value of your account. We charge an hourly rate of \$150 - \$250 for financial planning and consulting services. Fees are due and payable upon completion of the services. Generally, projects fall within a 4-to-8-hour range which is \$600-\$2000 per engagement. When clients receive advisory services through us, the financial planning charges that they accrue may be waived. For retirement plan services, our fee, which is based on the total assets under the plan, will not exceed 1.20%. For pension consulting services, we charge an hourly fee \$150 or a flat fee ranging from \$750 to \$10,000. Flat fees may also be charged as a percentage of assets within the pension plan not to exceed 1.5%.

The broker/dealer that holds your assets may charge you a transaction fee when we buy or sell an investment for you. These transaction fees are in addition to our fees. You may also pay charges imposed by the broker-dealer for custodial fees, account maintenance fees, fees related to mutual funds and variable annuities, and other product-level fees.

*You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.*

**For additional information**, please see our Form ADV Part 2A brochure Item 5, which is available online at: <https://adviserinfo.sec.gov/firm/summary/154927>

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

***What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?***

*When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.*

You can implement securities transactions with certain persons associated with our firm as Registered Representatives of Brokers International Financial Services, LLC (BIFS), an SEC registered broker-dealer and member of FINRA. BIFS will charge brokerage commissions to effect these securities transactions. You are encouraged to learn more about BIFS by reviewing BIFS's relationship summary and having a discussion with your financial professional. Furthermore, some of our financial professionals are licensed insurance agents with us, as we are also registered as an Insurance Agency primarily offering fixed insurance products. This presents a conflict of interest because financial professionals can recommend investment products and insurance products based on the compensation, they will receive from selling such products, rather than the client's needs. We do not reduce your advisory fees to offset the compensation that our financial professionals receive.

We recommend that you establish an account with a third-party independent custodian. We receive research products and services from the custodian to assist us in the performance of our investment decision-making responsibilities. These arrangements present a conflict of interest in that we have a financial incentive to recommend that you maintain your account with the custodian for the availability of these products and services and not solely on the nature, cost, or quality of custody and brokerage services provided by the custodian.

- How might your conflicts of interest affect me, and how will you address them?

**For additional information**, please see our Form ADV Part 2A brochure Items 5, 10, and 12, which is available online at: <https://adviserinfo.sec.gov/firm/summary/154927>.

***How do your financial professionals make money?***

Our financial professionals are compensated based on the revenue our firm earns from their advisory services or recommendations, the amount of client assets they service, referral fees from third-party money managers, and the time and complexity required to meet a client's needs. In addition, they are compensated with commissions based on the type of product sold. This presents a conflict of interest because those individuals can recommend the purchase of insurance and brokerage products where they would receive commissions or other compensation.

***Do you or your financial professionals have legal or disciplinary history?***

No, our firm or financial professionals do not have any legal or disciplinary history. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

- As a financial professional, do you have any disciplinary history? For what type of conduct?

**For additional information about our services**, you may visit the SEC's website at [adviserinfo.sec.gov](https://adviserinfo.sec.gov) by searching CRD #154927. If you would like additional, up-to-date information or a copy of this disclosure, please contact our firm at (515) 255-3306.

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

# *Welcome*



## Get to know more about **Legacy Financial Group**



**6000 Grand Ave Suite B  
Des Moines, IA 50312  
515.255.3306  
[lfgplanners.com](http://lfgplanners.com)**



# Nick Hemsted

Financial Advisor



Meet Nick, Legacy Financial Group's newest financial advisor. Joining the team in 2021 with a background as a personal banker and a zeal for helping millennials achieve their financial goals, he has the experience and expertise to provide guidance and support to clients who want to build and grow their wealth. This demographic faces unique financial challenges that Nick understands - from student loan debt to saving for a down payment on a house. He also knows that many people are looking for more than just traditional financial advice; they want a partner who can help them navigate the complex and ever-evolving financial landscape. He provides comprehensive financial planning and wealth management services that are tailored to each client's individual needs and goals.

Nick and his wife, Brittany, have two young sons who keep them very busy. When he is not studying for his Bachelor of Science in Business degree or his securities and insurance licenses, he can be found cheering on the Iowa Hawkeyes or fishing somewhere on a bank.



515.255.3306 | [nick@lfgplanners.com](mailto:nick@lfgplanners.com)

# Our Services: How We Can Help You

## Portfolio Management

Review Investment Strategy  
Brokerage Accounts

## Financial Planning

Goal Funding  
Cash Flow  
Budgeting  
Income Distribution  
Divorce Planning

## Retirement Planning

401(k) Rollover  
Pension Analysis  
Retirement Forecast

## Retirement Plans

Company 401(k)  
Solo 401(k)  
SEP IRAs  
SIMPLE IRAs  
Traditional IRAs  
Roth IRAs

## Review of Tax Situation

Roth Conversion<sup>4</sup>  
Backdoor Roth IRA  
Tax Management Strategies

## College Planning

529 Plans<sup>1</sup>  
UTMAs<sup>1</sup>

## Estate Review

Legacy Building<sub>2</sub>  
Review of Wills<sub>2</sub>  
Review of Trusts<sub>2</sub>  
Review of Beneficiaries  
Charitable Giving<sub>2</sub>

## Risk Review

Quantify Exposure to Risks  
Asset Allocation<sub>3</sub>  
Asset Preservation  
Risk Management/Review  
Coverage  
Life Insurance  
Health Insurance  
Long Term Care Insurance  
Medicare Supplements  
Long Term Care Insurance  
Disability Insurance  
Discuss & Explore Long-Term Care  
Risks

We extend our services further by working closely with a team of *experienced* individuals specializing in areas of Estate Planning, Public Accounting and various Insurance products.



Investment advisory services offered through Legacy Financial Group, LLC, a Registered Investment Advisor. Past performance is no guarantee of future returns. Securities offered through Brokers International Financial Services, LLC. Member SIPC. Legacy Financial Group and Brokers International Financial Services are not affiliated companies. Legacy Financial Group does not offer legal or tax advice. Please consult the appropriate professional regarding your individual circumstance. 1 A 529 plan is a college savings plan that allows individuals to save for college on a tax-advantaged basis. Every state offers at least one 529 plan. Before buying a 529 plan, you should inquire about the particular plan and its fees and expenses. You should also consider that certain states offer tax benefits and fee savings to in-state residents. Whether a state tax deduction and/or application fee savings are available depends on your state of residence. 2 For tax advice, consult your tax professional. Non-qualifying distribution earnings are taxable and subject to a 10% tax penalty. 3 Asset Allocation does not guarantee a profit nor protect against a loss in a declining market. It is a method used to help manage investment risk. 4 Converting an employer plan account or Traditional IRA to a Roth IRA is a taxable event. Increased taxable income from the Roth IRA conversion may have several consequences including but not limited to, a need for additional tax withholding or estimated tax payments, the loss of certain tax deductions and credits, and higher taxes on Social Security benefits and higher Medicare premiums. Be sure to consult with a qualified tax advisor before making any decisions regarding your IRA.



# Our Legacy: Our Foundation

As independent financial advisors, we take great pride in our freedom of thought when it comes to investment selection and investment philosophy. Our integrative approach enables us to work with our clients and for our clients.

Our business is built upon the following bedrock beliefs, and everyone who works at Legacy embodies these beliefs. We do not see them as words on a page, but descriptors of the way we conduct business and live our lives.

**Trust:** Our clients and colleagues can count on the fact that we aim to do the right thing by them. We seek to make choices that are in their best interests and earn this trust through demonstration.

**Excellence:** We commit to our clients and each other, to offer the very best we have to give and to continue to improve every day.

**Service:** Stated very simply and clearly; human beings are built to give. In serving other people, and each other, we find deep meaning and fulfillment.

**Happiness:** We believe having a company that projects good feelings, positive energy, and smiling faces is good business and helps us attract good things into the lives of our clients.

**Balance:** We do not believe in separating our personal lives from the work we do. This creates an environment that is relaxed, yet intensely focused on results at the same time. We believe this kind of balance helps our clients pursue the life they want.

## What You Can Expect from Legacy Financial Group

- Treat you with respect, honesty, and dignity.
- Be available when you need us.
- Consistently and responsibly perform all requested services.
- Act as your agent, putting your interests first under our fiduciary standards.
- Strive to acquire a complete and accurate understanding of your goals, your tolerance for investment risk and your time frame.
- Propose strategies customized to your situation, explain the implications of those strategies, and provide you with a proactive service.
- Work at your pace, but continue to stress making important decisions.



# Our Process: How We Work With You



## Understanding Your Situation

The first step is gathering data so we can understand your situation. The more information you provide, the better we can tailor our initial meeting. You'll receive a Confidential Data Form prior to meeting with us so we can hit the ground running.



## Identifying Your Goals

We will determine what your short and long-term goals are and what is important to you and your family.



## Analyzing Your Information

We will analyze your financial information to determine what changes could be helpful in moving you toward your goals and objectives.



## Developing Your Plan

Once we have analyzed your financial situation, we establish a plan and make recommendations to help you accomplish your goals and objectives.



## Presenting Your Plan

We use our tools and your information to develop a solid plan demonstrating how to take you from your current situation through your retirement and beyond.



## Implementing Your Plan

After agreeing on strategies, we will move forward with implementing the plan.



## Monitoring Your Plan

Monitoring your financial situation is an ongoing process that involves input from both parties. We meet with clients as often as needed in an effort to make sure that your plan remains on track.





# Our Team: Who We Are



**BRIAN HOOD, CFP®**  
Partner & Financial Advisor  
brian@lfgplanners.com



**BILL ELSON, CFP®**  
Partner & Financial Advisor  
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**RACHEL WOOD, CFP®, AIF®**  
Partner & Financial Advisor  
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**SCOTT NELSON**  
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**TAMARA SMITH, CDFA®**  
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**NICK HEMSTED**  
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**JODI BAKER, FPQP®**  
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**MIRANDA BLOCHER, FPQP®**  
Client Experience Specialist  
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**CHAD TERRY, CFP®, APMA®**  
Chief Executive Officer  
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**ANDREW SMITHSON**  
Systems & Finance Manager  
andrew@lfgplanners.com



# Our Mission: How We Strive To Serve



Our goal is to inspire and empower you to  
create the life you want -  
on *your* terms.

*Connect with us!*



Investment advisory services offered through Legacy Financial Group, LLC, a Registered Investment Advisor. Past performance is no guarantee of future returns. Securities offered through Brokers International Financial Services, LLC. Member SIPC. Legacy Financial Group and Brokers International Financial Services are not affiliated companies. Legacy Financial Group, LLC does not offer legal or tax advice. Please consult the appropriate professional regarding your individual circumstance.



## FORM ADV PART 2A

### FIRM BROCHURE

March 21, 2023

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This Part 2A of Form ADV ("Brochure") provides information about the qualifications and business practices of Legacy Financial Group, LLC (the "Advisor") or "LFG"). If you have any questions about the contents of this brochure, please contact us at (515) 255-3306 or email [chad.terry@lfgplanners.com](mailto:chad.terry@lfgplanners.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Legacy Financial Group, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site may be searched by a unique identifying number known as a CRD number. Legacy Financial Group, LLC's CRD number is 154927.

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Phone: (515) 255-3306

Email: [chad.terry@lfgplanners.com](mailto:chad.terry@lfgplanners.com)

Website: [www.lfgplanners.com](http://www.lfgplanners.com)

Address: 6000 Grand Avenue, Suite B, Des Moines, IA 50312



## **Item 2      Summary of Material Changes**

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This Disclosure Brochure, dated January 2023, contains information regarding our qualifications, business practices, nature of the advisory services we provide, as well as a description of potential conflicts of interest relating to our advisory business that could affect a client's account with us. You should rely on the information contained in this document or other information we have referred you to. We have not authorized anyone to provide you with information that is different. Legacy Financial Group encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you have with the Advisor. Adviser reports the following material changes since our last annual amendment dated March 14, 2022:

### *Material Changes Since the Last Update dated March 14, 2022*

Joseph Longenecker and Brooklyn Vitiritto have terminated their affiliation with Legacy Financial Group, LLC.

Legacy Financial Group launched a property and casualty insurance agency called LFG Insurance Services in March 2023.

Legacy Financial has eliminated their wrap fee program.

### **Item 3      Table of Contents**

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## **Item 4      Advisory Business**

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Legacy Financial Group, LLC ("the Adviser") has been in business as a Registered Investment Adviser since 2010 and also operates as doing business name of Longenecker Financial Services. The ownership of Legacy Financial Group, LLC has been changed effective October 1, 2020. Spectrum Wealth Advisors, Inc., which is owned by William Elson, Brian Hood, and Rachel Wood own 100% of Legacy Financial Group, LLC. The Adviser is a fiduciary and is required to act in a client's best interest at all times.

### **TYPES OF ADVISORY SERVICES OFFERED**

#### ***Investment Management***

Adviser offers discretionary and non-discretionary investment advisory services to individuals, high net worth individuals, families, and retirement plan accounts. The Adviser uses a time-tested, disciplined approach to investing. The Adviser is a "total portfolio" manager using an active, diversified investment approach. The Adviser believes that a portfolio should be diversified, and excess returns can be achieved by overweighting undervalued asset classes and investment styles. Typically, the Adviser tailors the portfolios to the individual needs of our clients by developing an investment policy statement with each client. The written investment policy statement sets forth the client's investment guidelines and objectives, which the Adviser uses to guide us in making investment decisions for each client. For discretionary accounts, we are authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or to be sold for the client's account without permission from the client prior to each transaction. For non-discretionary investment advisory services, Adviser will obtain client approval prior to taking any action in the account, including but not limited to, executing trades. We do not act as custodian of client assets, and the client will always maintain control of their assets.

#### ***Financial Planning, Consulting Services, & Financial Education Services***

The Adviser provides financial planning, consulting and plan update services to individuals and businesses consistent with the clients' financial and tax status, in addition to their risk profile and return objectives.

The Adviser starts the financial planning process by gathering information through a personal interview and taking a financial inventory. This generally involves gathering enough data to perform an analysis of client liabilities, cash flow, net worth and tax assessments. The Adviser's next step typically involves assisting clients with formalizing their goals and plotting their investment timeline as part of the financial planning process.

Written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the client. For example, recommendations may be made that the client begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. The Adviser may also provide non-securities advice on topics that may include but are not limited to, business, retirement, estate, budgetary, college, personal, and tax planning. It should be noted that the Adviser refers clients to

accountants, attorneys or other specialists, as necessary for non-advisory related services.

We help both clients and their legal teams better understand the impact of the financial decisions they make today and how that can impact the client's financial future through divorce consulting. We do not provide legal advice or draft legal documents, but recommend clients seek the counsel of an attorney as needed.

The Adviser also provides education services about general investment principles. Some education services are provided as presentations to employees at the request of an employer, or during a classroom environment. Education presentations will not take into account the individual circumstances of the attendees and individualized recommendations will not be provided unless otherwise agreed upon.

#### *Financial Planning & Consulting Conflicts of Interest*

There is a conflict of interest because there is an incentive for the Adviser when offering financial planning services to recommend products or services for which the Adviser or an associated person may receive compensation. However, financial planning clients are under no obligation to act upon any recommendations of the Adviser or to execute any transactions through the Adviser or an associated person if they decide to follow the recommendations.

#### *Retirement Plan Services*

The Adviser offers services to both plan sponsors and participants of retirement plans. Such services many consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. In providing employee benefit plan services, Advisor does not provide any advisory services with respect to the following type of assets: employer securities, real estate (excluding real estate funds and publicly trade REITS), participant loans, non-publicly traded securities or assets, other illiquid investments (collectively "Excluded Assets").

Advisor offers assistance in creating and establishing a plan's asset allocation and in evaluating, and monitoring investment options. This may include reviewing appropriate investment options for the plan, asset classes and investment styles, evaluating and recommending investment managers, types and selection of investment options. We may also conduct periodic reviews of the plan's investments to evaluate performance, risk characteristics and expenses and recommend changes where appropriate.

In addition, we may also work directly with plan participants to help them evaluate their retirement savings goals, determine appropriate investments for their specific retirement accounts, and implement appropriate contribution amounts and investments available in the plan. Advisor services plan participants on a discretionary or non-discretionary basis, pursuant to the plan documents and the plan participants preference.

All pension consulting services follow the applicable state law(s) regulating pension consulting services. This applies to client accounts that are pension or other employee benefit plans ("Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and the Adviser accepts appointments to provide our services to such accounts, the Adviser acknowledges that we are a fiduciary within the meaning



of Section 3(21) of ERISA (but only with respect to the provision of services described in the Advisor's 401K Investment Management Agreement).

The Firm does not act as custodian for any client account.

### Pension Consulting Services

The Adviser provides pension consulting services to employer plan sponsors on an ongoing basis. Generally, such pension consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure and participant education.

All pension consulting services follow the applicable state law(s) regulating pension consulting services. This applies to client accounts that are pension or other employee benefit plans ("Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and the Adviser accepts appointments to provide our services to such accounts, the Adviser acknowledges that we are a fiduciary within the meaning of Section 3(21) of ERISA (but only with respect to the provision of services described in section 1 of the Pension Consulting Agreement).

### Divorce Planning

We help both clients and their legal teams better understand the impact of the financial decisions they make today and how that can impact the client's financial future. We do not provide legal advice or draft legal documents, but recommend clients seek the counsel of an attorney as needed.

### Third Party Money Managers

The Adviser has established relationships with other investment advisers that offer a variety of investment advisory programs and services that include separate account portfolio management programs, asset allocation programs, wrap fee programs, and financial planning services. These other investment advisers are registered investment advisers or exempt from registration as investment advisers. The Adviser's Investment Adviser Representatives ("IARs") may recommend these other investment advisers to clients based on clients' financial needs.

Clients should understand that referral fees paid by these other investment advisers to the Adviser and the Adviser IARs may differ from one investment adviser to another investment adviser. Such conflicts may affect the independent judgment of the Adviser's IARs in the selection of other investment advisers that they recommend to clients. Establishing and terminating accounts with other investment advisers is dependent on the other investment advisers' termination policies and procedures. A complete description of these other investment adviser programs, services, termination provisions, and related fees and charges are described in these investment advisers' agreements and their Form ADV Part 2 Disclosure Brochures.

The Adviser's referrals to other investment adviser services are tailored to the individual needs of each client. The Adviser obtains financial information from prospective clients to determine the suitability of the Adviser's referrals to other investment adviser services. Each client may impose

restrictions on the types of referrals provided by the Adviser. The Adviser's IARs will be continuously available to meet with clients who are referred to these other investment advisers and open investment advisory accounts or establish financial planning services with these other investment advisers.

### **TAILORED RELATIONSHIPS**

Advisor offers the same suite of services to all of its clients. The management services and recommendations offered by the Adviser are based on the individual needs of our clients and the suitability of products and services. Specific client financial plans and their implementation are dependent upon each client's current situation (income, objectives, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients have the opportunity to place reasonable restrictions on the types of investments to be held in their portfolio. However, restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

### **WRAP FEE PROGRAMS**

The Adviser does not offer a wrap fee program.

### **ASSETS UNDER MANAGEMENT**

Adviser manages a total of \$ 603,348,631 of assets under management on a discretionary basis and \$1,276,874 on a non-discretionary basis for a total of \$604,625,505 as of December 31, 2022

## **Item 5 Fees and Compensation**

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### *Investment Management*

Our standard advisory fee ranges from 0.70 to 1.2%, depending in part on, the size of the account, prospective growth, complexity, and other factors that may differ from client to client, with break points for AUM thresholds. These fees are billed quarterly, in advance, based on daily average balance (cash values unless exempted) of the Assets of the previous quarter\*. Fees do not include execution costs for brokerage transactions. All fees are negotiable at the Adviser's discretion. The fee you will pay will be disclosed in your advisory agreement. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. Advisor will also bill on a pro rata basis for any additional contributions made during a billing period after the initial contribution.

\* As Advisor is in the process of implementing this fee calculation method, legacy clients may continue to be billed quarterly, based upon the market value of the Assets on the last day of the previous quarter during this transition period.

Fees will be deducted from the client's account at an independent qualified custodian upon their written authorization. In rare cases, Adviser will agree to directly bill clients. As part of this process, clients understand and acknowledge the following:

- (a) The client's independent custodian sends statements at least quarterly showing all disbursements for the account, including the amount of the advisory fees paid to Adviser;
- (b) The client provides authorization permitting Adviser to be directly paid by these terms;
- (c) If Adviser sends a copy of an invoice to the client, Adviser will also send a copy of the invoice to the independent custodian;
- (d) If Adviser sends a copy of an invoice to clients, the invoice will include a legend that urges the client to compare information provided in their invoice with statements received from the qualified custodian.

#### Financial Planning & Consulting Fees

The Adviser charges clients a range of \$150 - \$250 an hour for financial planning and consulting services. Clients are given a quote that is based on the hourly rate times an estimate of the number of hours a project will take. This is based on the range and complexity of the services the Adviser will provide. Generally, projects fall within a 4-to-8-hour range which is \$600-\$2000 per engagement. The fee-paying arrangements for financial planning services will be detailed in the signed Agreement.

The Adviser may waive the financial planning charges when clients receive advisory services through persons associated with the Adviser.

If clients elect to implement recommendations made in a financial plan, their accounts may incur retirement plan administration fees, and other mutual fund annual expenses that are charged by broker-dealers, plan administrators or mutual fund companies that sell securities or provide additional services to Adviser clients. These fees are in addition to and separate from financial planning and consulting fees.

Fees are due and payable upon completion of the services. Under no circumstances will the Adviser charge fees in excess of \$1,200 more than six months in advance of services rendered.

Clients will have a period of five (5) business days from the date of signing an agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, clients may terminate an agreement by providing the Adviser with written notice prior to delivery of the plan or completion of the service. The Adviser may terminate an agreement by providing written notice to clients. Since fees are payable only after services are provided, there are no unearned fees and the client will not have a refund due upon early termination of the advisory agreement.

#### Financial Education Program Fees

For Financial Education services, the Adviser charges a flat fee or a fee of \$100 - \$150 per student depending upon the educational program chosen.

#### Retirement Plan Services

Our standard advisory fee ranges from 0.70 to 1.2%, depending in part on, the size of the account, prospective growth, complexity, and other factors that may differ from client to client, with break points for AUM thresholds. The Plan Participant's fee tier will be determined by the



total value of the Plan Assets. These fees are billed quarterly, in advance, based on daily average balance (cash values unless exempted) and calculated based upon the total plan assets of the previous quarter\*. Fees do not include execution costs for brokerage transactions. All fees are negotiable at the Adviser's discretion. The fee you will pay will be disclosed in your advisory agreement. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. Advisor will also bill on a pro rata basis for any additional contributions made during a billing period after the initial contribution.

\* As Advisor is in the process of implementing this fee calculation method, legacy clients may continue to be billed quarterly, based upon the market value of the Assets on the last day of the previous quarter during this transition period.

Fees will be deducted from the client's account at an independent qualified custodian upon their written authorization. In rare cases, Adviser will agree to directly bill clients. As part of this process, clients understand and acknowledge the following:

#### Pension Consulting Fees

We charge on an hourly or flat fee basis for pension consulting services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you. Our hourly fee is \$150. Our flat fees generally range from \$750 to \$10,000 or may be charged as a percentage of assets within the pension plan not to exceed 1.5%. Flat fees will be charged annually in arrears for ongoing pension consulting services.

The fee-paying arrangements for pension consulting service will be determined on a case-by-case basis and will be detailed in the signed Pension Consulting Agreement. The client will be invoiced directly for the fees. In cases where the fee is charged as a percentage of assets within the plan, the ongoing fee shall be due and payable quarterly in advance based upon the value of the Plan's Account(s) on the last day of the quarter. Should the Plan have more than one Account, the Fee shall be payable in proportion to the respective Account value(s). The Adviser's fees will be debited directly from the Plan's Account(s) and Client authorizes the custodian for the Plan assets, which may be upon instruction from the Plan's administrator, to deduct Adviser's fees directly from the Plan's Account(s). Adviser shall not be compensated on the basis of a share of capital gains or capital appreciation of the Plan's Account(s).

In addition to Adviser's consulting fee, the Client may also incur certain charges imposed by unaffiliated third parties. Such charges include, but are not limited to, custodial fees, administrative fees, brokerage commissions, transaction fees, charges imposed directly by a mutual funds, index funds, or exchange traded funds purchased for the account which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), wire transfer fees and other fees and taxes on brokerage accounts and securities transactions.

#### **TERMINATION AND REFUNDS**

We charge our asset based advisory fees quarterly in advance. In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close your account and process a pro-rata refund of unearned advisory fees.

Financial Planning and Consulting clients may terminate their agreement at any time before the delivery of a financial plan by providing written notice. In the event of a termination before the delivery of a financial plan, Clients will receive a refund of an unearned, prepaid fees and an invoice documenting the time spent working on the financial plan up to the point of termination.

### **COMMISSIONABLE SECURITIES SALES**

Certain Investment Adviser Representatives (IARs) with Legacy Financial Group are dually Registered Representatives of Brokers International Financial Services, LLC ("Brokers Financial") a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In their positions as a registered broker the representatives may sell and accept compensation for the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. You should be aware that the practice of accepting commissions for the sale of securities:

1. Presents a conflict of interest and gives the advisor an incentive to recommend investment products based on the compensation received, rather than on the client's needs. Our firm generally addresses commissionable sales conflicts that arise when explaining to clients that commissionable securities sales creates an incentive to recommend products based on the compensation he may earn and/or when recommending commissionable mutual funds, explaining that "no-load" funds are also available.
2. In no way prohibits you from purchasing investment products recommended by us through other brokers or agents which are not affiliated with us.
3. Does not exceed more than 50% of our revenue.
4. Does not reduce your advisory fees to offset the commissions our supervised persons receive.

Adviser notes that commissions are not charged to its fee-based / investment advisory clients. In the event that a client pays a load fee for a mutual fund and then later wishes to move to a fee-based account, Advisor does not charge fees on those impacted assets for any time remaining up to twenty-four (24) months from when a commission was received.

### **TRADE ERRORS**

Any Adviser created trade errors that result in a net debit to client accounts will be debited against Adviser's Error Account and the client made whole. Any Adviser created trade errors that result in a net credit will be donated to a charity of the Custodian's choice.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

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The Adviser does not charge or receive, directly or indirectly, any performance-based fees and does not participate in side-by-side arrangements.

## **Item 7 Types of Clients**

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The Adviser provides advisory services to:

- Individuals and High Net Worth Individuals;
- Trusts, Estates or Charitable Organizations;
- Pension and Profit Sharing Plans;
- Corporations, Limited Liability Companies and/or Other Business Types.

## **ACCOUNT MINIMUMS**

The Adviser does not impose a minimum account requirement on clients.

## **Item 8      Methods of Analysis, Investment Strategies and Risk of Loss**

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The Adviser works with each client to design an appropriate investment strategy based on client financial and tax status, risk tolerance and investment objectives. The Adviser usually recommends investment strategies for the long-term, but may occasionally recommend short-term investment and hedging strategies. The Adviser generally recommends a target asset mix with periodic rebalancing.

The Adviser uses the following methods of analysis in formulating investment advice and may use outside analysts to review the portfolios:

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be significantly different from technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security. In providing certain advice in connection with certain clients, research, asset allocation methodologies and investment strategies are used.

### Technical Analysis

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. It attempts to predict a future stock price or direction based on market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. The risk is that markets do not always follow patterns and relying solely on this method may not work long term. We may recommend the use of both fundamental and technical analysis strategies for a client in order to provide yet another form of risk management by offering differing investment styles.

The Adviser uses the following investment strategies when providing investment advice:

Long term purchases. Securities are purchased with the idea of holding them for a relatively long time (typically held for at least a year).



Short term purchases. Securities are purchased with the idea of selling them within a relatively short time (typically a year or less).

Options. Options are used to “hedge” the purchase of the underlying security. Options are purchased to limit the potential upside or downside of a security purchased in a client’s portfolio.

Structured Notes. Structured notes may be used to reduce risk exposure in a client’s portfolio based on current market trends.

This is not intended to be an all-inclusive list.

### **USE OF PRIMARY METHOD OF ANALYSIS OR STRATEGY**

The Adviser’s primary method of analysis or strategy is long term purchases. Long term purchases is a strategy in which investments (such as stocks, bonds, mutual funds, etc.) are bought and held for a long period, which is generally at least one year or more. Generally, this strategy is not influenced by short term market fluctuations because the approach rests upon the assumption that long term prices will go up because of an expanding economy with profits, dividends and increased stock prices. Long term purchases minimize portfolio turnover, which can reduce commission costs, and taxes can be reduced or deferred. Some of the risks involved with using this method include short term market volatility causing investor concern, risk of loss when the asset is sold, market or company volatility or loss. Investments carry a risk of loss of principal, earnings or both. Past performance is not a guarantee of future performance.

### **RISK OF LOSS**

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, the Adviser is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate a client from losses due to market corrections or declines. There are certain additional risks associated when investing in securities.

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of

company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

- Fixed Income Risk. When investing in fixed income instruments such as bonds or notes, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an Exchange Traded Fund or mutual fund, a client will bear additional expenses based on the client's pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investments will vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If you implement our financial planning recommendations and our investment strategies do not produce the expected results, the value of your investment may decrease.
- Credit Risk – Credit risk can be a factor in situations where an investment's performance relies on a borrower's repayment of borrowed funds. With credit risk, an investor can experience a loss or unfavorable performance if a borrower does not repay the borrowed funds as expected or required. Investment holdings that involve forms of indebtedness (i.e. borrowed funds) are subject to credit risk.
- Liquidity Risk – Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, you may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.

This is not intended to be an all-inclusive list. Each client should review the mutual fund prospectus for the specific risks related to each fund that is held in each account.

## **Item 9      Disciplinary Information**

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The Adviser does not have any disciplinary information to disclose.

### **ITEM 9.A – CRIMINAL OR CIVIL ACTIONS**

Neither the Adviser nor any management person has been found guilty of or has any criminal or civil actions pending in a domestic, foreign or military court.

### **ITEM 9.B – ADMINISTRATIVE PROCEEDINGS**

Neither the Adviser nor any management person has any administrative proceedings pending before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

### **ITEM 9.C – SELF-REGULATORY ORGANIZATION ("SRO") PROCEEDINGS**

Neither the Adviser nor any management person has been found by any SRO to have caused an investment-related business to lose its authorization to do business, or to have been involved in a violation of the SRO's rules, or been barred or suspended from membership or from association with other members, or expelled from membership, otherwise significantly limited from investment-related activities, or fined.

## **Item 10      Other Financial Industry Activities and Affiliations**

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### **ITEM 10.A – BROKER-DEALER REGISTRATION**

The IARs are Registered Representatives of Brokers Financial, a member of FINRA/SIPC. Each IAR, in his or her capacity as a Registered Representative, may recommend securities or other products and receive normal transaction fees, commissions or other compensation. The Investment Adviser Representative's Brokers Financial affiliation is an outside business activity and is not monitored, endorsed, or supervised by the Adviser. Thus, a conflict of interest exists between his interests and those of advisory clients. Clients are under no obligation to act upon any of his recommendations or affect any transactions through him if they decide to follow his recommendations.

### **ITEM 10.B – FUTURES COMMISSION MERCHANT/COMMODITIES**

#### *Commodity Broker*

Neither the Adviser nor any management person is a commodity broker/futures commission merchant, a commodity pool operator, commodity trading advisor or an associated person for the foregoing entities; nor do they have any registration applications pending.

### **ITEM 10.C – RELATIONSHIPS WITH RELATED PERSONS**

Certain associated persons are insurance agents appointed with various insurance companies. In these capacities associated persons of the Adviser may recommend insurance, or other products, and receive commissions and other compensation if products are purchased through any firms



with which any associated persons are affiliated. Thus, a conflict of interest exists between the interests of associated persons and those of the advisory clients. However, clients are under no obligation to act upon any of their recommendations or execute any transactions through them if they decide to follow their recommendations.

#### **ITEM 10.D – RELATIONSHIPS WITH OTHER ADVISERS**

Legacy Financial Group, LLC has no advisory affiliates to disclose.

#### **ITEM 10.E – RELATIONSHIPS WITH RELATED INSURANCE AGENCY**

LFG Insurance services, LLC provides property and casualty coverage as well as life insurance and is under common ownership with the Adviser.

Clients are never obligated or required to purchase insurance products from our affiliated insurance company and may choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale. Please refer to ITEM 14- Client Referrals and Other Compensation for more information regarding the insurance commissions received by our affiliated insurance agency and the conflicts such compensation presents.

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

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#### **ITEM 11.A – CODE OF ETHICS**

The Adviser has adopted a Code of Ethics that sets forth standards of conduct expected of advisory personnel and to address conflicts that arise from personal trading by advisory personnel. The Adviser and its investment adviser representatives act as fiduciaries with respect to our investment management services under this agreement. As fiduciaries, we are required to act prudently, and put your interest above our own when managing your account, and receive no more than reasonable compensation for our services. We will also adhere to the Impartial Conduct Standards incorporated in certain prohibited transaction exemptions promulgated by the United States Department of Labor when applicable to our services and activities under this agreement. Advisory personnel are obligated to adhere to the Code of Ethics, and applicable securities and other laws.

The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. The Adviser will provide a copy of the Code to any client or prospective client upon request.

## **ITEM 11.B – PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

### *Principal Trading*

Neither the Adviser nor any affiliated broker-dealer affects securities transactions as principal with the Adviser's clients.

### *Personal Trading of Associates Affiliated with a Brokerage Firm*

Each IAR, in his or her capacity as a Registered Representative of Brokers Financial may receive payments from certain mutual funds distributed pursuant to a 12b-1 distribution plan, or other such plans, as compensation for administrative services, representing a separate financial interest.

As such, a conflict of interest exist with respect to recommendations to buy or sell securities. In all cases, recommendations are made in the best interests of the client. The Adviser does not permit insider trading and has implemented procedures to ensure that its policy regarding insider trading is being observed by associated persons.

### *Agency-Cross Action Transactions*

Neither the Adviser nor any associated person recommends to clients or buys or sells for client accounts securities in which the Adviser or an associated person has a material financial interest. Neither the Adviser nor any associated person acting as a principal, buys securities from (or sells securities to) clients, acts as general partner in a partnership in which Adviser solicits client investments, or acts as an investment adviser to an investment company that the Adviser recommends to clients.

## **ITEM 11.C – PERSONAL TRADING BY ASSOCIATED PERSONS**

The Adviser recommends that clients invest in various types of assets. The Adviser and its associated persons may invest in the same types of assets. Permitted investments for associated persons are all asset classes. **See Item 11.D for conflicts of interest.**

## **ITEM 11.D – CONFLICTS OF INTEREST WITH PERSONAL TRADING BY ASSOCIATED PERSONS**

Associated persons may own an interest in or buy or sell for their own accounts the same securities, which may be recommended to advisory clients. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to clients, and their personal transactions are regularly monitored.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Adviser does not deem appropriate to buy or sell for clients.

## **Item 12      Brokerage Practices**

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The Adviser recommends that clients use Charles Schwab & Company, Inc. ("Schwab"), or TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), members of FINRA /SIPC and registered broker-dealers, as a qualified custodian. The Adviser is independently owned and operated and is not affiliated with Schwab, or TD Ameritrade. The Adviser takes into account a blend of different factors in determining which qualified custodian may be used, but Clients should be aware that the costs associated with using one qualified custodian over another will vary. The relationship described between the Adviser and each qualified custodian herein varies, and this has an impact on the conflicts of interest present which clients should be aware of.

Charles Schwab & Company, Inc. – The Adviser has evaluated Schwab and believes that it will provide our clients with a blend of execution services, commission costs, and professionalism that will assist the Adviser in meeting its fiduciary obligations to clients. The Adviser receives certain benefits that it would not receive if it did not offer investment advice to clients. Schwab provides the Adviser with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab. These services are not contingent upon our firm committing to Schwab any specific amount of business other than maintaining the client asset level mentioned above (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab also makes available to our firm other products and services that benefit us but do not directly benefit our clients' accounts. Many of these products and services are used to service all or some substantial number of our client accounts. Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that provide access to client account data (such as trade confirmations and account statements), that facilitate trade execution and allocate aggregated trade orders for multiple client accounts, that facilitate payment of our fees from clients' accounts and assist with back-office functions, recordkeeping and client reporting. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services may include compliance, legal and business consulting; publications and conferences on practice management and business succession; and access to employee benefits providers, human capital consultants and insurance providers. Schwab makes available, arranges and/or pays third-party vendors for the types of services rendered to the Adviser. Schwab discounts or waives fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab also provides other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we generally take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a potential conflict of interest.

TD Ameritrade – The Adviser participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade "), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. The Adviser receives some benefits from TD Ameritrade through its participation in the Program. There is no direct link between the Adviser's participation in the program and the investment advice it gives to its Clients, although we receive economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our clients; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Adviser by third-party vendors. Some of the products and services made available by TD Ameritrade through the program benefit the Adviser but do not directly benefit its Client accounts. These products or services assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop its business enterprise. The benefits received by the Adviser or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the Adviser endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Adviser or its related persons in and of itself creates a conflict of interest and can indirectly influence the Adviser's choice of TD Ameritrade for custody and brokerage services.

#### **ITEM 12.A – FACTORS IN SELECTING OR RECOMMENDING BROKER-DEALERS**

The Adviser seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. The Adviser considers a wide range of factors, including, among others, these:

- Ability to maintain the confidentiality of trading intentions
- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Liquidity of the securities traded
- Willingness to commit capital
- Ability to place trades in difficult market environments
- Research services provided



- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation

Each IAR, in his or her capacity as a Registered Representative of Brokers Financial may also suggest that clients implement recommendations through Brokers Financial. If the client so elects, the IAR would receive normal and customary commissions in his or her capacity as a registered person of Brokers Financial presenting a conflict of interest. Furthermore, in implementing a financial plan, clients may pay commissions or fees that are higher or lower than those that may be obtained elsewhere for similar services. Clients are advised that they are under no obligation to implement the plan or its recommendations through the IAR in his or her capacities as a Registered Representative.

*Item 12.A1 – Research and Other Soft Dollar Benefits*

The Adviser does not receive soft dollars generated by the securities transactions of its clients. The term "soft dollars" refers to funds which are generated by client trades being used by the Adviser to purchase products or services (such as research and enhanced brokerage services) from or through the broker-dealers whom the Adviser engages to execute securities transactions.

*Item 12.A2 – Brokerage for Client Referrals*

The Adviser does not refer clients to particular broker-dealers in exchange for client referrals from those broker-dealers.

*Item 12.A3 – Directed Brokerage*

The Adviser does not require that clients direct their brokerage business to any particular broker-dealer.

**ITEM 12.B – TRADE AGGREGATION**

On occasions when the Firm deems the purchase and sale of a security to be in the best interests of more than one of its clients, the Firm may aggregate multiple contemporaneous client purchase

or sell orders into a block order for execution. Executed orders are allocated among participating accounts according to each account's pre-determined participation in the transaction.

Clients' accounts for which orders are aggregated receive the average price of such transaction, which could be higher or lower than the price that would otherwise be paid by a client absent the aggregation. Any transaction costs incurred in the transaction will be assessed to each client based on each client's level of participation in the transaction. Please refer to the Block Trading Procedures for specifics.

### **Item 13      Review of Accounts**

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IARs perform reviews of investment advisory accounts no less than quarterly. Accounts are reviewed for consistency with the investment strategy and performance, among other things. Reviews may be triggered by changes in an account holder's personal, tax, or financial status. There is currently no limit on the number of accounts that can be reviewed by an IAR.

Financial plans are reviewed only upon request. Clients are notified prior to this review that a new client engagement may be established, and any projected fees associated with the new engagement will be disclosed.

The Adviser does not provide any periodic reports to clients unless asked to do so. Any reports provided from the Adviser will be specific to the services client has requested pursuant to an executed agreement with the Adviser.

Pension Consulting clients receive reviews of their pension plans for the duration of the pension consulting service. We also provide ongoing services to Pension Consulting clients where we meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Pension Consulting clients do not receive written or verbal updated reports regarding their pension plans unless they choose to contract with us for ongoing Pension Consulting services.

### **Item 14      Client Referrals and Other Compensation**

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#### **CLIENT REFERRALS**

If you were introduced to us through a solicitor, we may pay that solicitor a referral fee in accordance with Rule 206(4)-1 of the Advisers Act and applicable state securities laws. The referral fee shall be paid solely from the Management Fee as discussed above and shall not result in any additional charge to you. If you were introduced to us through a solicitor, you acknowledge receipt of the written Solicitor Disclosure Statement disclosing the terms of the solicitation arrangement between us and the solicitor, including the compensation to be received by the solicitor from us.

The Adviser offers reduced Financial Planning fees to employees of the State of Iowa through the Perks Spot offering.

As part of our employee compensation package, incentive bonuses may be allocated based on referring new client relationships.

## **RECEIPT OF ADDITIONAL COMPENSATION**

As disclosed under Item 12 of this Brochure, we participate in Schwab and TD Ameritrade's institutional customer program and we may recommend Schwab or TD Ameritrade to Clients for custody and brokerage services. There is no direct link between our firm's participation in the program and the investment advice we give to our Clients, although we receive economic benefits through our participation in the program that are typically not available to Schwab or TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our firm's participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. Schwab and TD Ameritrade may also have paid for business consulting and professional services received by our firm's related persons. Some of the products and services made available by Schwab or TD Ameritrade through the program may benefit our firm but may not benefit our Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at Schwab or TD Ameritrade. Other services made available are intended to help us manage and further develop our business enterprise. The benefits received by our firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to Schwab or TD Ameritrade. As part of our fiduciary duties to our clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons in and of itself creates a conflict of interest and may influence our firm's choice of Schwab or TD Ameritrade for custody and brokerage services.

LFG Insurance Services, LLC is licensed to sell P&C insurance. LFG Insurance Services, LLC is under common ownership with the Adviser. Any commissions received by the P&C insurance agency will benefit the owners of the Adviser and clients of the Adviser will be solicited to purchase P&C insurance. However, there is no obligation for any Adviser client to purchase P&C insurance through the agency,

The Adviser's related persons that are insurance agents and insurance agencies receive commissions and other incentive awards for the recommendation/sale of insurance products. The receipt of this compensation may affect the judgement of our related persons when recommending products to its clients. While our related persons endeavor at all times to put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of commission and additional compensation itself creates a conflict of interest and may affect the judgement of insurance agents when making insurance product recommendations.

## **Item 15      Custody**

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The Adviser doesn't accept physical custody of client funds or securities. Client assets are held by qualified custodians. Clients may have standing letters of authorization on their accounts. The Firm has reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

Schwab and TD Ameritrade sends account statements directly to clients on at least a quarterly basis. Clients should carefully review these statements, and should compare these statements to any account information provided by the Adviser.

## **Item 16 Investment Discretion**

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It is Adviser's customary procedure to have full discretionary authority in order to supervise and direct the investments of a client's accounts. Client's grant this authority upon execution of Adviser's Discretionary Investment Management Agreement. This authority is for the purpose of making and implementing investment decisions, without the client's prior consultation. All investment decisions are made in accordance with the client's stated investment objectives. Other than management fees due to Adviser, which Adviser will receive directly from the custodian, Adviser's discretionary authority does not give authority to take or have possession of any assets in the client's account or to direct delivery of any securities or payment of any funds held in the account to Adviser. Furthermore, Adviser's discretionary authority by agreement does not allow it to direct the disposition of such securities or funds to anyone except the account owner.

Clients may impose reasonable restrictions, in writing, on investing in certain securities or types of securities in accordance with their values and beliefs. Adviser will make every effort to comply with the wishes of the client but cannot guarantee absolute adherence due to our use of indexed products, funds, and ETFs that are controlled by third party managers.

As discussed in Item 4, Advisor may manage employer sponsored retirement plans on a nondiscretionary basis for certain plan participants pursuant to the plan documents and client preference. All other client accounts will be managed on a discretionary basis. Adviser has a limited number of nondiscretionary, but is not adding additional accounts at this time.

## **Item 17 Voting Client Securities**

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The Adviser does not accept authority to vote proxies on behalf of clients as a matter of policy. Clients will receive their proxy information directly from their custodian.

Clients may contact the Adviser with questions about a particular solicitation by telephone at (515) 255-3306.

## **Item 18 Financial Information**

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The Adviser does not require or collect prepayment of more than \$1,200 in fees, six months or more in advance, so no balance sheet is being provided. There is no financial condition that is reasonably likely to impair the Adviser's ability to meet its contractual commitments to its clients. The Adviser has not been subject to a bankruptcy petition at any time.



## Privacy Notice

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**Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Legacy Financial Group, LLC.**

**Information We Collect:** In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

**Categories of Information We Disclose:** We may only disclose information that we collect in accordance with this policy. Legacy Financial Group, LLC does not sell customer lists and will not sell your name to telemarketers.

**Categories of Parties to Whom We Disclose:** We will not disclose information regarding you or your account at Legacy Financial Group, LLC, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies,
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

**How We Use Information:** Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Legacy Financial Group, LLC;

- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

**Regulation S-AM:** Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Legacy Financial Group, LLC does not receive information regarding marketing eligibility from affiliates to make solicitations.

**Regulation S-ID:** Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

**Our Security Policy:** We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

**Complaint Notification:** Please direct complaints to: Chad Terry at Legacy Financial Group, LLC; 6000 Grand Ave, Suite B, Des Moines, IA 50312; (515) 255-3306.

**Changes to This Privacy Policy:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Legacy Financial Group, LLC; 6000 Grand Ave, Suite B, Des Moines, IA 50312; (515) 255-3306.

**Item 1: Cover Page**

**Investment Adviser  
Brochure Supplement Part 2B**

**Scott Roger Arnburg**

**CRD Number: 5443467**

**Legacy Financial Group, LLC  
6000 Grand Avenue, Suite B  
Des Moines, IA 50312  
(515) 255-3306**

**[www.lfgplanners.com](http://www.lfgplanners.com)**

**March 2023**

This brochure supplement provides information about Scott R. Arnburg that supplements the Legacy Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Chad Terry at 515-255-3306 if you did not receive Legacy Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Scott R. Arnburg is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

Scott R. Arnburg was born in 1972. He received a Radiologic Technology certification from the Marian Health Center School of Radiology in 1993. He has passed Series 6, 7, and 66 securities license examinations.

### **Business Experience**

#### **Firm Name and Title**

#### **Dates**

Legacy Financial Group, LLC, Investment Adviser Representative	02/2010-present
LPL Financial, Registered Representative/Investment Adviser Representative	01/2010-04/2014
Directed Services LLC, Registered Representative	11/2007-01/2010

## **Item 3 – Disciplinary Information**

Mr. Arnburg does not have any legal or disciplinary events to disclose. Mr. Arnburg is not the subject of any pending legal, disciplinary or administrative proceedings..

## **Item 4 – Other Business Activities**

Mr. Arnburg is an insurance agent appointed with various insurance companies. In such capacity, he may recommend insurance or other products, and receive commissions and other compensation if products are purchased through any firms with which he is affiliated. Thus, a conflict of interest exists between the interests of Mr. Arnburg and those of advisory clients. However, clients are under no obligation to act upon any of Mr. Arnburg's recommendations or execute any transactions through him if they decide to follow his recommendations.

## **Item 5 – Additional Compensation**

Mr. Arnburg has nothing to disclose in this regard.

## **Item 6 – Supervision**

Chad Terry is the Chief Compliance Officer and is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Terry's telephone number is (515) 255-3306. Mr. Terry reviews all written client performance materials and newsletters submitted by the supervised persons prior to use. Mr. Terry randomly attends the investment committee and supervised person's client meetings. The supervised persons employed by the Adviser conduct all Client contact. The supervised persons of the Adviser receive the Adviser's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material. Through an electronic environment, Mr. Terry is able to review client information, including client statements.



**Item 1: Cover Page**

**Investment Adviser  
Brochure Supplement Part 2B**

**William Bemis Elson, CFP®**

**CRD Number: 1808374**

**Legacy Financial Group, LLC  
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**[www.lfgplanners.com](http://www.lfgplanners.com)**

**March 2023**

**This brochure supplement provides information about William Elson that supplements the Legacy Financial Group, LLC. You should have received a copy of that brochure. Please contact Chad Terry at 515-255-3306 if you did not receive Legacy Financial Group's brochure or if you have any questions about the contents of this supplement.**

**Additional information about William Elson also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **ITEM 2 Educational Background and Business Experience**

William Elson, CFP®, born in 1963, is an Investment Adviser Representative with Legacy Financial Group, LLC beginning July of 2016. As of August 2018, Mr. Elson is a Registered Representative of Brokers International Financial Services, LLC (Brokers Financial) and previously was with Broker Dealer Financial Services Corporation from 2016 to August 2018. Mr. Elson was also with VSR Advisory Services from 1989 until 2016.

Formal education after high school: Iowa State University, Bachelor of Science, 1985. He has passed his Series licenses 24 (05/2007), 7 (07/1988), 31 (06/2000), and 63 (04/1988).

Mr. Elson earned the designation of Certified Financial Planner™ in 1992 through the College of Financial Planning, Denver, Colorado. In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>

## **Item 3 - Disciplinary Information**

Mr. Elson is not subject to any legal or disciplinary events of a material nature. Additional information about Mr. Elson may be found on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), or at FINRA's Broker Check website at [www.finra.org](http://www.finra.org).

## **Item 4 - Other Business Activities**

Registered Representative and Insurance

Mr. Elson is a Registered Representative of Brokers Financial, a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Mr. Elson is also an insurance agent appointed with various insurance companies. Mr. Elson is also an insurance agent.

In these capacities Mr. Elson may recommend securities, insurance, or other products, and receive commissions and other compensation if products are purchased through any firms with which Mr. Elson is affiliated. Thus, a conflict of interest may exist between the interests of Mr. Elson and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of Mr. Elson or affect any transactions through Mr. Elson if they decide to follow the recommendations. The Investment Adviser Representative's Brokers Financial affiliation is an outside business activity and is not monitored, endorsed, or supervised by the Adviser.

Other Outside Business Activity

None of Mr. Elson's outside business activities are 10% of his time or revenue. Legacy does not supervise and does not receive any compensation from these Other Outside Business Activity.

## **Item 5 - Additional Compensation**

Mr. Elson may earn sales awards or marketing credits depending on levels of overall securities sales in connection with providing securities and/or advisory services to clients. These awards

constitute a conflict of interest as they could encourage Mr. Elson to recommend transactions for the purpose of attaining these awards. Clients are under no obligation to engage in any securities transactions. We have implemented supervisory procedures to monitor our advisory representatives' business activity.

### **Item 6 – Supervision**

Chad Terry is the Chief Compliance Officer and is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Terry's telephone number is (515) 255-3306. Mr. Terry reviews all written client performance materials and newsletters submitted by the supervised persons prior to use. Mr. Terry randomly attends the investment committee and supervised person's client meetings. The supervised persons employed by the Adviser conduct all Client contact. The supervised persons of the Adviser receive the Adviser's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material. Through an electronic environment, Mr. Terry is able to review client information, including client statements.

**Item 1: Cover Page**

**Investment Adviser  
Brochure Supplement Part 2B**

**Brian Joseph Hood, CFP®**

**CRD Number: 1787301**

**Legacy Financial Group, LLC  
6000 Grand Avenue, Suite B  
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(515) 255-3306**

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**March 2023**

**This brochure supplement provides information about Brian Hood that supplements the Legacy Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Chad Terry at 515-255-3306 if you did not receive Legacy Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Brian Hood is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 – Educational Background and Business Experience

Brian Joseph Hood was born in 1967. He received an Associate's degree in Business Administration and Financial Management from the American Institute of Business in 1988. He has passed Series 6, 7, 24, and 63 securities license examinations.

Mr. Hood has earned and maintains the following professional designation with the qualification requirements listed:

### **Certified Financial Planner™ (CFP®) Year earned-2007**

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

### **Business Experience**

<b>Firm Name and Title</b>	<b>Dates</b>
Legacy Financial Group, LLC, Principal/Investment Adviser Representative	05/2002-present
Broker International Financial Services, LLC, Registered Representative	08/2018 – present
Broker Dealer Financial Services Corp. Registered Representative	07/2016 – 08/2018
Purshe Kaplan Sterling Investments, Inc., Registered Representative	04/2014-07/2016
LPL Financial, Registered Principal/Investment Adviser Representative	03/1995-04/2014
Legacy Planning Group, Associate	05/2003-12/2005
Legacy Financial, Associate	03/1995-05/2002
New England Securities, Registered Representative	06/1991-03/1995

## Item 3 – Disciplinary Information

Mr. Hood does not have any legal or disciplinary events to disclose. Mr. Hood is not the subject of any pending legal, disciplinary or administrative proceedings.

## Item 4 – Other Business Activities

Registered Representative and Insurance

Mr. Hood is a Registered Representative of Brokers Financial, a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Mr. Hood is also an insurance agent appointed with various insurance companies.

In these capacities Mr. Hood may recommend securities, insurance, or other products, and receive commissions and other compensation if products are purchased through any firms with which Mr. Hood is affiliated. Thus, a conflict of interest may exist between the interests of Mr. Hood and those of the advisory clients. However, clients are under no obligation to act upon any



recommendations of Mr. Hood or affect any transactions through Mr. Hood if they decide to follow the recommendations. The Investment Adviser Representative's Brokers Financial affiliation is an outside business activity and is not monitored, endorsed, or supervised by the Adviser.

#### Other Outside Business Activity

None of Mr. Hood's outside business activities are 10% of his time or revenue. Legacy does not supervise and does not receive any compensation from these Other Outside Business Activities.

### **Item 5 – Additional Compensation**

Mr. Hood has nothing to disclose in this regard.

### **Item 6 – Supervision**

Chad Terry is the Chief Compliance Officer and is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Terry's telephone number is (515) 255-3306. Mr. Terry reviews all written client performance materials and newsletters submitted by the supervised persons prior to use. Mr. Terry randomly attends the investment committee and supervised person's client meetings. The supervised persons employed by the Adviser conduct all Client contact. The supervised persons of the Adviser receive the Adviser's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material. Through an electronic environment, Mr. Terry is able to review client information, including client statements.

**Item 1: Cover Page**

**Scott Andrew Nelson**

**CRD Number: 6727545**

**Legacy Financial Group, LLC  
6000 Grand Avenue, Suite B  
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(515) 255-3306**

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**March 2023**

**This brochure supplement provides information about Scott Nelson that supplements the Legacy Financial Group, LLC. You should have received a copy of that brochure. Please contact Chad Terry at 515-255-3306 if you did not receive Legacy Financial Group's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Scott Nelson also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**ITEM 2 Educational Background and Business Experience**

Scott Nelson, born in 1975, is an Investment Adviser Representative with Legacy Financial Group, LLC beginning October 2017 and began employment with them November 2016. Mr. Nelson was with Select Medical as a Business Development Manager from September 2015 to October 2016 and Landmark Medical/Dynasplint Systems as a Sales Manager/Consultant from June 2004 to September 2015.

Formal education after high school: Associates Degree in Business Administration from AIB College of Business, Des Moines, Iowa, 1997; Bachelors Degree in Business Administration from Graceland University, Des Moines, Iowa, 2004. He has passed the Series 65 securities license examination.

**Item 3 - Disciplinary Information**

Mr. Nelson does not have any legal or disciplinary events to disclose. Mr. Nelson is not the subject of any pending legal, disciplinary or administrative proceedings.

**Item 4 - Other Business Activities**

Mr. Nelson, in his individual capacity, is a licensed insurance agent, and recommends the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Nelson to purchase insurance products on a commission basis. Mr. Nelson's sales of insurance-related products also make him eligible to receive other forms of compensation, including health insurance, a deferred compensation plan, sales awards, and incentive trips if certain sales thresholds are met.

The recommendation by Mr. Nelson that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions or other compensation provides an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. The client's particular needs and goals are considered when purchasing an insurance contract. No client is under any obligation to purchase any insurance commission products from Mr. Nelson. Clients are reminded that they may purchase insurance products recommended by Mr. Nelson through other, non-affiliated insurance agents.

**Item 5 - Additional Compensation**

None. Mr. Nelson receives additional compensation through his outside business activities, as discussed in Item 4.

**Item 6 – Supervision**

Chad Terry is the Chief Compliance Officer and is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Terry's telephone number is (515) 255-3306. Mr. Terry reviews all written client performance materials and newsletters submitted by the supervised persons prior to use. Mr. Terry randomly attends the investment committee and supervised person's client meetings. The supervised persons employed by the Adviser conduct all Client contact. The supervised persons of the Adviser receive the Adviser's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material. Through an electronic environment, Mr. Terry is able to review client information, including client statements.

**Item 1: Cover Page**

**Investment Adviser  
Brochure Supplement Part 2B**

**Tamara Lynn Smith, CDFATM**

**CRD Number: 4248825**

**Legacy Financial Group, LLC  
6000 Grand Avenue, Suite B  
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(515) 255-3306**

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**March 2023**

This brochure supplement provides information about Tamara Smith that supplements the Legacy Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Chad Terry at 515-255-3306 if you did not receive Legacy Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Tamara Smith is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

Tamara Smith was born in 1970. She received a B.A. in Business Administration-Management with an emphasis on Marketing from Simpson College in 1998. She received an Associates in Accounting/Business Administration from the American Institute of Business in 1991. She has passed the Series 66 securities license examination.

Ms. Smith has held the designation of Certified Divorce Financial Analyst (CDFA™) since August 2021. CDFA™ professionals must develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the Institute for Divorce Financial Analysts. CDFA™ professionals must have two years minimum experience in a financial or legal capacity prior to earning the right to use the CDFA™ certification mark.

### **Business Experience**

<b>Firm Name and Title</b>	<b>Dates</b>
Legacy Financial Group, LLC, Investment Adviser Representative	11/2018-present
Peterson Financial Group, Inc., Investment Adviser Representative	10/2016-11/2018
Princor Financial Services Corporation, Registered Representative	08/2013-10/2016
American Diabetes Association, Associate Manager, Development	03/2016-07/2016
Principal Life Insurance Company, Agent	08/2013-12/2015
Princor Financial Services Corporation, Registered Representative	10/2004-07/2013
Principal Life Insurance Company, Compliance Advisor	05/1992-07/2013

## **Item 3 – Disciplinary Information**

Tamara Smith does not have any legal or disciplinary events to disclose. Tamara Smith is not the subject of any pending legal, disciplinary or administrative proceedings.

## **Item 4 – Other Business Activities**

Ms. Smith, in her individual capacity, is a licensed insurance agent, and recommends the purchase of certain insurance-related products on a commission basis. Clients can engage Ms. Smith to purchase insurance products on a commission basis.

The recommendation by Ms. Smith that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions or other compensation provides an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. The client's particular needs and goals are considered when purchasing an insurance contract. No client is under any obligation to purchase any insurance commission products from Ms. Smith. Clients are reminded that they may purchase insurance products recommended by Ms. Smith through other, non-affiliated insurance agents.

## **Item 5 – Additional Compensation**

Ms. Smith receives additional compensation through her outside business activities, as discussed

in Item 4.

### **Item 6 – Supervision**

Chad Terry is the Chief Compliance Officer and is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Terry's telephone number is (515) 255-3306. Mr. Terry reviews all written client performance materials and newsletters submitted by the supervised persons prior to use. Mr. Terry randomly attends the investment committee and supervised person's client meetings. The supervised persons employed by the Adviser conduct all Client contact. The supervised persons of the Adviser receive the Adviser's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material. Through an electronic environment, Mr. Terry is able to review client information, including client statements



**Item 1: Cover Page**

**Investment Adviser  
Brochure Supplement Part 2B**

**Rachel Elaine Wood CFP®**

**CRD Number: 4666482**

**Legacy Financial Group, LLC  
6000 Grand Avenue, Suite B  
Des Moines, IA 50312  
(515) 255-3306**

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**March 2023**

**This brochure supplement provides information about Rachel Wood that supplements the Legacy Financial Group, LLC. You should have received a copy of that brochure. Please contact Chad Terry at 515-255-3306 if you did not receive Legacy Financial Group's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Rachel Wood also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **ITEM 2 Educational Background and Business Experience**

Rachel Wood, born in 1981, is an Investment Adviser Representative with Legacy Financial Group, LLC beginning July of 2016. As of August 2018, Ms. Wood is a Registered Representative of Brokers International Financial Services, LLC (Brokers Financial) and previously was with Broker Dealer Financial Services Corporation from 2016 to August 2018. Ms. Wood was with VSR Advisory Services from 2003 until 2016.

Formal education after high school: AIB College of Business, AAS in Business Administration/Financial Services, 2001; AIB College of Business, BS in Business Administration, 2011. She has passed her Series licenses 6 (01/2005), 7 (12/2007), 63 (04/2005), and 66 (01/2008).

She has earned the AIF designation November 2016.

### **AIF® - Accredited Investment Fiduciary®**

#### **AIF® MINIMUM QUALIFICATIONS:**

The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

## **Certified Financial Planner™ (CFP®) Year earned-2022**

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>

## **Item 3 - Disciplinary Information**

Ms. Wood does not have any legal or disciplinary events to disclose. Ms. Wood is not the subject of any pending legal, disciplinary or administrative proceedings.

## **Item 4 - Other Business Activities**

### **Registered Representative and Insurance**

Ms. Wood is a Registered Representative of Brokers Financial, a registered broker-dealer, member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Ms. Wood is also an insurance agent appointed with various insurance companies. Ms. Wood is also an insurance agent with Spectrum Financial Services.

In these capacities Ms. Wood may recommend securities, insurance, or other products, and

receive commissions and other compensation if products are purchased through any firms with which Ms. Wood is affiliated. Thus, a conflict of interest may exist between the interests of Ms. Wood and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of Ms. Wood or affect any transactions through Ms. Wood if they decide to follow the recommendations. The Investment Adviser Representative's Brokers Financial affiliation is an outside business activity and is not monitored, endorsed, or supervised by the Adviser.

#### Other Outside Business Activity

None of Ms. Wood's outside business activities are 10% of her time or revenue. Legacy does not supervise and does not receive any compensation from these Other Outside Business Activity.

### **Item 5 - Additional Compensation**

Ms. Wood may earn sales awards or marketing credits depending on levels of overall securities sales in connection with providing securities and/or advisory services to clients. These awards constitute a conflict of interest as they could encourage Ms. Wood to recommend transactions for the purpose of attaining these awards. Clients are under no obligation to engage in any securities transactions. We have implemented supervisory procedures to monitor our advisory representatives' business activity.

### **Item 6 – Supervision**

Chad Terry is the Chief Compliance Officer and is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Terry's telephone number is (515) 255-3306. Mr. Terry reviews all written client performance materials and newsletters submitted by the supervised persons prior to use. Mr. Terry randomly attends the investment committee and supervised person's client meetings. The supervised persons employed by the Adviser conduct all Client contact. The supervised persons of the Adviser receive the Adviser's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material. Through an electronic environment, Mr. Terry is able to review client information, including client statements.

**Item 1: Cover Page**

**Investment Adviser  
Brochure Supplement Part 2B**

**Nicholas William Hemsted**

**CRD Number: 7456732**

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Des Moines, IA 50312  
(515) 255-3306**

**[www.lfgplanners.com](http://www.lfgplanners.com)**

**March 2023**

**This brochure supplement provides information about Nick Hemsted that supplements the Legacy Financial Group, LLC. You should have received a copy of that brochure. Please contact Chad Terry at 515-255-3306 if you did not receive Legacy Financial Group's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Nick Hemsted also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**ITEM 2 Educational Background and Business Experience**

Nick Hemsted, born in 1995, is a Relationship Manager with Legacy Financial Group, LLC beginning October 2021. Previously Mr. Hemsted was a Private Banking Associate with Bankers Trust from October 2016 to October 2021.

Formal education after high school: Associates in Arts, Des Moines Area Community College.

Mr. Hemsted passed the Series 65 Uniform Investment Adviser Law Examination in February 2023.

**Item 3 - Disciplinary Information**

Mr. Hemsted does not have any legal or disciplinary events to disclose. Mr. Hemsted is not the subject of any pending legal, disciplinary or administrative proceedings.

**Item 4 - Other Business Activities**

Mr. Hemsted is an insurance agent appointed with various insurance companies. In such capacity, he may recommend insurance or other products, and receive commissions and other compensation if products are purchased through any firms with which he is affiliated. Thus, a conflict of interest exists between the interests of Mr. Hemsted and those of advisory clients. However, clients are under no obligation to act upon any of Mr. Hemsted's recommendations or execute any transactions through him if they decide to follow his recommendations.

**Item 5 - Additional Compensation**

Mr. Hemsted does not receive any compensation for providing investment advice to any non-client.

**Item 6 – Supervision**

Chad Terry is the Chief Compliance Officer and is responsible for monitoring the activities of the Adviser's supervised persons. Mr. Terry's telephone number is (515) 255-3306. Mr. Terry reviews all written client performance materials and newsletters submitted by the supervised persons prior to use. Mr. Terry randomly attends the investment committee and supervised person's client meetings. The supervised persons employed by the Adviser conduct all Client contact. The supervised persons of the Adviser receive the Adviser's Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material. Through an electronic environment, Mr. Terry is able to review client information, including client statements.