

Item 1 – Cover Page

## **Legacy Advisory Network, LLC**

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**February 22, 2022**

### **Form ADV Part 2A Brochure**

Legacy Advisory Network, LLC is a registered investment adviser. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Legacy Advisory Network, LLC. If you have any questions about the contents of this brochure, please contact us at (614) 336-7660. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Legacy Advisory Network, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our firm's unique CRD# is 313266.

**Material Changes - Item 2**

The purpose of this page is to inform you of any material changes since the previous version of this disclosure brochure. We will review and update our brochure, as needed and at least annually, to make sure that it remains current.

On February 22, 2022, we submitted our annual updating amendment for fiscal year 2021. There were no material changes to report.

If you would like to receive a complete copy of our current brochure free of charge at any time, please contact Gregory Taylor, Chief Compliance Officer, at (641) 336-7660 or [greg@legacyretirementgroup.com](mailto:greg@legacyretirementgroup.com).

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#### **Advisory Business - Item 4**

Legacy Advisory Network, LLC (hereinafter “Legacy Advisory Network” or the “firm”) is a registered investment adviser based in Dublin, Ohio. We are a limited liability company, organized under the laws of the State of Ohio. Legacy Advisory Network has been providing investment advisory services since 2021. Gregory A. Taylor and Kristin A. Taylor are the principal owners of Legacy Advisory Network.

As used in this brochure, the term “Associated Person” refers to anyone from our firm who is an officer, an employee, and all individuals providing investment advice on behalf of our firm. Where required, such persons are properly registered as investment adviser representatives (IARs).

Any material conflicts of interest between you and our firm, or our Associated Persons are disclosed in this brochure. If at any time, additional material conflicts of interest arise, we will provide you with written notification of the material conflicts of interest or an updated brochure.

Currently, we offer wealth management services, personalized for each individual client.

#### **Wealth Management Services**

Our wealth management process commences with the development of a financial plan. The financial planning process starts with an analysis of the client’s individual needs, predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Once we collect and analyse all documentation, we provide a financial plan designed to assist the client in working toward their financial goals and objectives. The financial plan may be provided verbally or in writing. We then assist the client in developing a strategy to assist the client in managing income, assets, and liabilities. In general, financial planning services may include any one or all of the following:

- Cash Flow Analysis - Assessment of a client’s present financial situation by collecting information regarding net worth and cash flow statements, tax returns, insurance policies, investment portfolios, employer sponsored plans, employee benefit statements, etc. The firm advises on ways to reduce risk and to coordinate and organize records and estate information.
- Retirement Analysis - Identification of a client’s long-term financial and personal goals and objectives includes advice for accumulating wealth for retirement income or appropriate distribution of assets following retirement. Tax consequences and implications are identified and evaluated.
- Insurance Analysis - Includes risk management associated with advisory recommendations based on a combination of insurance types to meet a client’s needs, e.g., life, health, disability, and long-term care insurance. This will necessitate an analysis of cash needs of family at death, income needs of surviving dependents, and disability income analysis.
- Portfolio Analysis/Investment Planning – We provide investment alternatives, including asset allocation and their potential effects on a client’s portfolio. We evaluate economic and tax characteristics of existing investments as well as their suitability for a client’s objectives. We identify and evaluate tax consequences and their implications.
- Estate Analysis – We provide advice with respect to property ownership, distribution strategies, estate tax reduction, charitable giving, and tax payment techniques.

The recommendations and solutions are designed to assist the client in reaching their desired goals subject to periodic evaluation of the financial plan, which may require revision to meet changing circumstances. Financial plans are based on your financial situation based on the information provided to the firm. We recommend a plan review at least annually. Updates to written plans are billable at the then current financial planning fees.

*Note: Information related to tax or legal consequences provided as part of a plan or consultation is for informative purposes only. You are encouraged to contact your tax professionals or attorneys for tax or legal advice.*

#### Selection of Other Advisers

Once a financial plan has been delivered, we provide clients with access to a broad spectrum of investment solutions. We focus on delivering a personalized approach to developing and maintaining a customized portfolio, utilizing asset allocation, diversification and tax-awareness. Under such services, the firm provides non-discretionary investment monitoring and consulting services on a non-continuous basis, where the investment advice provided is custom tailored to meet the needs and investment objectives of the client. Such services are provided by introducing clients to a network of unaffiliated third party investment advisers ("TPIA") to manage their entire portfolio and monitoring the TPIA(s) to ensure their performance and investment style remains aligned with the investment goals and objectives of the client. The TPIA will actively manage your portfolio and will assume discretionary investment authority over your account. The TPIA(s) may use one or more model portfolios to manage your account. We will assume discretionary authority to reallocate your assets, where we deem such action to be appropriate.

Associated Persons of Legacy Advisory Network will periodically review reports provided to the client and will contact the client periodically, as agreed upon with each client, to review the client's financial situation and objectives, communicate information to TPIAs as warranted, to assist the client in understanding and evaluating the services provided by TPIA(s) and to update the client's financial plan. We will not manage or obtain investment discretion or trading authority over these client assets. However, we will recommend reallocation of the client's assets to other TPIA(s), where such action is deemed to be in the best interest of the client. Clients will be expected to notify us of any changes in their financial situation, investment objectives, or account restrictions. Clients can also directly contact their TPIAs regarding such changes.

Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPIA's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPIA's performance to ensure its management and investment style remains aligned with your investment goals and objectives. All TPIAs that the firm recommends to its clients must either be exempt from registration or registered as investment advisers with the Securities and Exchange Commission or with the appropriate state authority(ies).

You will be required to sign an agreement directly with the recommended TPIA. You may terminate your advisory relationship with the TPIA according to the terms of your agreement with the TPIA. You should review each TPIA's disclosure brochure and advisory agreement for specific information on how you may terminate your advisory relationship with the TPIA and how you may receive a refund, if applicable. You should contact the TPIA directly for questions regarding your advisory agreement with the TPIA. A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions, and other aspects of each program are detailed and disclosed in: i) the TPIA's Form ADV Part 2A; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager(s) selected; or, iv)

the TPIA's, the broker-dealer's, and/or the custodian's account opening documents. A copy of all relevant disclosure documents of the TPIA and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Prior to the client entering into a management agreement with a TPIA, the TPIA fees, including the portion of the fee that will be paid to Legacy Advisory Network, will be fully disclosed.

#### **Types of Investments**

We do not recommend specific securities or one particular type of security over other types of securities. Generally, clients may not impose restrictions on investing in certain securities or types of securities in accounts managed by a TPIA. Please consult with the recommended TPIA regarding their policies on imposing restrictions on investments in particular securities or certain types of securities.

#### **Wrap Fee Programs**

Legacy Advisory Network does not manage or sponsor any wrap fee programs. However, recommended TPIAs may offer wrapped and/or non-wrapped pricing options. Wrap pricing structures allow the client to pay an all-inclusive fee for management, brokerage, clearance, custody, and administrative services. Transaction costs may also be charged for the execution and clearance of advisory transactions directed by such TPIAs.

#### **Assets Under Management**

Due to the structure of our business, we do not have reportable regulatory assets management.

### **Fees and Compensation - Item 5**

#### **Wealth Management Services Fees**

Legacy Advisory Network does not charge a standalone fee, but receives a portion of the fee paid to the TPIA. The combined negotiable fee paid to our firm and the TPIA will not exceed 2.00% of the client's assets under management. The compensation we receive is based on a pre-negotiated agreement with the TPIA.

Legacy Advisory Network or its Associated Persons may have an incentive to recommend one TPIA over another TPIA with whom it has less favorable compensation arrangements or other advisory programs offered by TPIAs with which it has no compensation arrangements. In order to address this conflict, our firm has adopted a code of ethics that obliges all associated persons to deal fairly with all clients, to uphold their fiduciary duty, and to put the client's interest first.

Legacy Advisory Network does not bill TPIA client accounts directly and does not deduct advisory fees from client accounts. All fees are deducted by the TPIA managing the account and a portion of that fee is paid to our firm.

#### **Additional Fees and Expenses**

As part of the advisory services provided through TPIAs, you may be invested in, or solicited to invest in, mutual funds and exchange traded funds. The management fees that you pay to the TPIA (including the portion paid to our firm) are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (as described in each fund's prospectus) to their shareholders. These fees will generally include a management fee

and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian that executes transactions for your account(s). We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, TPIAs, and others.

**Billing on Cash Positions:** The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

**Periods of Portfolio Inactivity:** The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

**Compensation for the Sale of Securities or Insurance Products**

Neither our firm nor persons associated with our firm accept compensation for the sale of securities, including asset-based sales charges or service fees from the sale of mutual funds. However, individuals associated with Legacy Advisory Network, including Mr. Taylor, are also licensed, independent insurance agents who are eligible to earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions are separate and in addition to advisory services and fees. The receipt of commission-based compensation presents a conflict of interest because persons providing investment advice on behalf of our advisory firm who are licensed insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than making recommendations based solely on your needs. Clients are under no obligation contractually or otherwise, to purchase insurance products through any person or entity affiliated with our firm.

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

Performance based fees are based on a share of capital gains on or capital appreciation of the client's assets. Legacy Advisory Network does not accept performance based fees.

#### Types of Clients - Item 7

We generally offer investment advisory services to individuals and high net worth individuals. At the onset of a new client relationship, Legacy Advisory Network generally requires a minimum investment of \$500,000 for the establishment and maintenance of an investment advisory account. This requirement can be met by combining two or more accounts owned by a client or a client's related family members. At Legacy Advisory Network's sole discretion, we may waive this requirement.

Accounts managed by TPIAs may be subject to minimum investment requirements. We will only recommend TPIAs and/or programs for which you meet any minimum requirements. Please review the applicable disclosure brochures and client agreements of the recommended TPIAs for information on any minimum requirements they may require.

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

Our firm will refer clients to TPIAs that provide advice to clients in accordance with the relevant programs provided by the TPIA. We recommend TPIAs whose investment programs and strategies we have reviewed and determined to be appropriate for you based on your individual circumstances and investment goals. We will not recommend particular securities or directly manage your assets. Clients should refer to the disclosure documents provided by the TPA for more information about these firm's methods of analysis, investment strategies, and risks associated with investments.

**Investing in securities involves risk of loss that clients should be prepared to bear.** Clients should fully understand the nature of the contractual relationship(s) into which they are entering and the extent of their exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources, and other relevant circumstances.

**General Investment Risk:** All investments come with the risk of loss. Investing may involve substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

**Loss of Value:** There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political, and economic developments, and government, economic or monetary policies.

**Concentrated Position Risk:** Certain Associated Persons may recommend that clients concentrate account assets in an industry or economic sector. In addition to the potential concentration of accounts in one or more sectors,



certain accounts may, or may be advised to, hold concentrated positions in specific securities. Therefore, at times, an account may, or may be advised to, hold a relatively small number of securities positions, each representing a relatively large portion of assets in the account. As a result, the account will be subject to greater volatility than a more sector diversified portfolio. Investments in issuers within an industry or economic sector that experiences adverse economic, business, political conditions or other concerns will impact the value of such a portfolio more than if the portfolio's investments were not so concentrated. A change in the value of a single investment within the portfolio will affect the overall value of the portfolio and will cause greater losses than it would in a portfolio that holds more diversified investments.

**Cybersecurity Risks:** Our firm and our service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate; however, unintentional events may have similar effects. Cyber-attacks may cause losses to clients by interfering with the processing of transactions, affecting the ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose our firm to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While our firm has established a business continuity plan and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cyber security risks are also present for issuers of securities, investment companies and other investment advisers in which we invest, which could result in material adverse consequences for such entities and may cause a client's investment in such entities to lose value.

**Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption. It is difficult to predict the long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Workforce reductions, travel restrictions, governmental responses and policies and macroeconomic factors will negatively impact investment returns.

**Recommendation of Other Advisers:** In the event we recommend a third-party investment adviser to manage all or a portion of your assets, we will advise you on how to allocate your assets among various classes of securities or third-party investment managers, programs, or managed model portfolios. As such, we will primarily rely on investment model portfolios and strategies developed by the third-party investment advisers and their portfolio managers. If there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark, we may recommend changing models or replacing a third-party investment adviser. The primary risks associated with investing with a third party is that while a particular third party may have demonstrated a certain level of success in the past; it may not be able to replicate that success in future markets. In addition, as we do not control the underlying investments in third party model portfolios, there is also a risk that a third party may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. To mitigate this risk, we seek third parties with proven track records that have demonstrated a

consistent level of performance and success over time. A third party's past performance is not a guarantee of future results and certain market and economic risks exist that may adversely affect an account's performance that could result in capital losses in your account. Please refer to the third-party investment adviser's advisory agreements, Form ADV Brochure, and associated disclosure documents for details on their specific investment strategies, methods of analysis, and associated risks.

**Cryptocurrency Risk:** Cryptocurrency (e.g., bitcoin and ether), often referred to as "virtual currency", "digital currency," or "digital assets," is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, the most well-known of which is bitcoin. Certain of the firm's clients may have exposure to bitcoin or another cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies, including bitcoin, has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline. Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi-national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. The SEC has issued a public report stating U.S. federal securities laws require treating some digital assets as securities.

Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

#### **Disciplinary Information - Item 9**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or of the integrity of our management. Legacy Advisory Network does not have a history of material legal or disciplinary events that are required to be reported in this section.

Information regarding the history of the firm and its registered personnel can be found online at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

#### **Other Financial Industry Activities or Affiliations - Item 10**

Neither Legacy Advisory Network nor its advisory affiliates are registered as, or have pending applications to register as, broker/dealers, Futures Commission Merchants, Commodity Pool Operators, or Commodity Trading Advisors, or are currently associated persons of any the foregoing types of entities.

##### **Other Financial Industry Activities or Affiliations**

Mr. Taylor and other Associated Persons of our firm are licensed insurance agents. As disclosed above in Item 5 above, they are eligible to receive commissions for the sale of insurance products. Commissions generated for the sale of insurance products by such Associated Persons are separate and distinct from Legacy Advisory Network's advisory fees. The firm expects that clients to whom it offers advisory services may also be clients for whom such individuals act as insurance agents. Clients are instructed that the fees paid to the firm for advisory services are separate and distinct from the commissions earned by Associated Persons for placing the client in insurance products. Clients to whom the firm offers advisory services are informed that they are under no obligation to use the firm's Associated Persons for insurance services and may use the insurance brokerage firm and agent of their choice. Mr. Taylor spends the majority of his professional time in his capacities as an insurance agent.

##### **Recommendation of Other Advisers**

Where you engage a TPIA that we recommend, we will receive compensation from the TPIA for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of a particular TPIA over another TPIA with which we have more favorable compensation arrangements or other professional relationships. Comparable services may be available for lower or higher fees through other service providers with which we have no compensation arrangements or other professional relationships. In order to address this conflict, our firm has adopted a code of ethics that obliges all associated persons to deal fairly with all clients, to uphold their fiduciary duty, and to put the client's interest first. Clients are not required to use the services of any TPIA we recommend.

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

##### **Description of Our Code of Ethics**

Legacy Advisory Network has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The

Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes the firm's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics.
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of the firm's Code of Ethics is available upon request at (641) 336-7660.

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

We endeavor to uphold our fiduciary responsibilities to our clients at all times. Neither Legacy Advisory Network nor any related person of our firm buys, sells, or recommends specific securities for clients' investment accounts in which our firm or any related person of our firm has a material financial interest.

However, at times Legacy Advisory Network and/or related persons of our firm may recommend, hold, or take positions in the same securities as clients. Although they would not necessarily be aware of timing of trades being considered by the TPIA prior to the transaction, this could be considered a conflict of interest with clients. Where Legacy Advisory Network and any related persons of our firm are aware that the TPIA is considering specific transactions for clients' accounts on a specific trading day where there is a potential material conflict, they will make every effort to be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades for which they are aware.

### **Brokerage Practices - Item 12**

#### **Brokerage Practices**

Due to the nature of our business, we do not manage client assets directly; rather, client assets are managed by a TPIA recommended by our firm or independently selected by the client. Clients who have implemented investments through a recommended TPIA may be encouraged or required to use the broker-dealers and/or custodians recommended or selected by the TPIA. You should review each recommended TPIA's disclosure brochure for specific information on their brokerage practices.

#### **Research and Other Soft Dollar Benefits**

We do not receive any research or other soft dollar benefits from broker-dealers in connection with client securities transactions.

#### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers and custodians, and we do not receive other benefits from a

broker-dealer in exchange for client referrals.

**Directed Brokerage**

Legacy Advisory Network does not directly manage client assets; therefore, it does not direct client brokerage.

**Trade Aggregation/Block Trading**

Legacy Advisory Network does not place any trades or block trades (i.e., aggregate trades for multiple client accounts for an average share price). However, TPIAs may or may not aggregate trades for client accounts.

Please carefully review the disclosure documents provided by the TPIA for more information on their brokerage and trading practices.

**Review of Accounts - Item 13**

**Account Reviews**

Mr. Taylor, or the Associated Person assigned to the client relationship, will review client accounts on a periodic basis and review periodic reports provided to the client by TPIAs and/or account custodians. Under normal circumstances, we contact the client at least annually, or more often as agreed upon with each client, to review the client's financial situation and objectives, communicate information to the TPIA managing the account as necessary, and to assist the client in understanding and evaluating the services provided by the TPIA. If needed, we may also update the client's financial plan as part of these reviews. Clients will be expected to notify our firm of any changes in their financial situation, investment objectives, or account restrictions. Additional reviews may be provided when client circumstances change, or upon client request.

Clients receive account statements directly from their account custodian(s) at least quarterly. The TPIA typically provides additional quarterly reports related to the account holdings, market values, and performance. We receive copies of such reports for review and we will review them with you as needed. Information regarding account reviews and additional reporting provided by TPIAs managing client accounts is disclosed in the separate disclosure documents maintained and provided by relevant TPIAs. If you have questions about your account statements from the account custodian, you should contact the TPIA and/or the custodian preparing the statement or let us know and we will assist you.

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

**Referral Compensation**

Our firm does not compensate, directly or indirectly, any person or entity for client referrals. However, we do share in a portion of the advisory fees paid to TPIAs that we refer clients for the management of their accounts. This compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the TPIA. However, you are not obligated to use the services of any TPIA we recommend.

**Other Compensation**

Please refer to Item 5 above for information about compensation received by licensed individuals associated with Legacy Advisory Network for the sale of insurance products.

#### Custody - Item 15

We do not directly debit fees from your accounts and do not otherwise exercise custody over your funds or securities.

#### Investment Discretion - Item 16

We do not have investment discretion over your funds or securities. Where client assets are managed by third parties, such third parties may have discretion pursuant to the management agreement signed with the client.

#### Voting Client Securities - Item 17

Legacy Advisory Network will not vote proxies on behalf of clients' accounts managed by third parties. We will not offer clients advice regarding corporate actions and the exercise of proxy voting rights and/or materials. Refer to the disclosure brochure of recommended TPIAs for information on their proxy voting policies.

#### Financial Information - Item 18

Legacy Advisory Network is required in this item to provide you with certain financial information or disclosures about its financial condition. We do not require the prepayment of over \$500 per client, six or more months in advance. Additionally, we have no financial condition or commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and neither our firm nor our management person or individuals providing investment advice been the subject of a bankruptcy proceeding.

#### Requirements of State-Registered Advisers - Item 19

##### **Principal Executive Officer and Management Person**

Gregory A. Taylor, Chief Executive Officer and Chief Compliance Officer, and Kristin A. Taylor are the principal executive officers and management persons.

##### **Kristin A. Taylor**

Year of Birth: 1981

*Formal Education After High School:*

- The Ohio State University, BS, Hospitality Management, 2004

*Business Background for the Previous Five Years:*

- Legacy Advisory Network, LLC, Owner/Vice President, 01/2021 to Present
- Legacy Wealth Partners (dba Legacy Retirement Group), Owner/Vice President, 2007 to Present

Please see Items 2 of the attached Form ADV Part 2B Brochure Supplement below for information regarding Mr. Taylor's educational and business backgrounds.

**Outside Business Activities**

Please see Item 10 – Other Financial Industry Activities and Affiliations above in this Form ADV Part 2A disclosure brochure, as well as the relevant Form ADV Part 2B brochure supplement(s) below for information regarding outside business activities of our Associated Persons.

**Performance Based Fees**

Performance-based fees are based on a share of capital gains on or capital appreciation of the client's assets. We do not accept performance-based fees.

**Disciplinary Information**

Neither Legacy Advisory Network nor any of its management personnel has a history of material legal or disciplinary events that are required to be reported in this section. Information regarding the history of the firm and its registered personnel can be found online at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our firm's unique CRD# is 313266.

**Other Relationships or Arrangements With Issuers of Securities**

Legacy Advisory Network and its Associated Persons do not have any relationships or arrangements with any issuer of securities.

**Miscellaneous**

**Confidentiality**

Legacy Advisory Network views protecting its customers' private information as a top priority; and, pursuant to the requirements of the Gramm-Leach-Bliley Act the firm has instituted policies and procedures to ensure that customer information is kept private and secure.

Legacy Advisory Network does not disclose any non-public personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, Legacy Advisory Network may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

Legacy Advisory Network restricts internal access to non-public personal information about its clients to those employees who need to know that information in order to provide products or services to the client. Legacy Advisory Network maintains physical and procedural safeguards that comply with state and federal standards to guard a client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above,

it has always been and will always be the firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the firm's policy not to share information unless required to service your account, at your request, or as required by law.

A copy of the firm's privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the Advisory Agreement. If you have any questions on this policy, please contact our Chief Compliance Officer, Gregory Taylor at (614) 336-7660 or [greg@legacyretirementgroup.com](mailto:greg@legacyretirementgroup.com).