

Item 1: Cover Page

# *Future Path Financial Planning*

*a d/b/a of Legacy Growth Wealth Management LLC*

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## **Form ADV Part 2A Appendix 1 – Wrap Fee Program Brochure**

Dated: April 2026

This Wrap Fee Program Brochure provides information about the qualifications and business practices of Legacy Growth Wealth Management LLC. If you have any questions about the contents of this Brochure, please contact us at (850) 517-7015. 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.

Legacy Growth Wealth Management LLC is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about Legacy Growth Wealth Management LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number, 336296.

Future Path Financial Planning is a doing-business-as (d/b/a) name of Legacy Growth Wealth Management LLC. All investment advisory and financial planning services offered under the Future Path Financial Planning name are provided by Legacy Growth Wealth Management LLC, a Florida state-registered investment adviser (CRD# 336296). Future Path Financial Planning can be reached online at [www.futurepathplanning.com](http://www.futurepathplanning.com). The principal office address remains the same as Legacy Growth Wealth Management LLC.

## Item 2: Material Changes

- Since our last annual amendment filed on January 30, 2026, Legacy Growth Wealth Management LLC has registered the doing-business-as (d/b/a) name "Future Path Financial Planning." The firm now conducts business under both Legacy Growth Wealth Management LLC and Future Path Financial Planning. All advisory services provided under the Future Path Financial Planning name are offered by Legacy Growth Wealth Management LLC (CRD# 336296). The firm's website for Future Path Financial Planning is [www.futurepathplanning.com](http://www.futurepathplanning.com). There have been no changes to the firm's legal entity, ownership, advisory services, or fee structure.
- Fee Adjustment for Active Financial Planning Members. We have added disclosure in Item 5 describing a reduced annual wrap fee of 0.80% available to clients who are actively enrolled in and current on the Future Path Financial Planning Program. This reduced rate reflects that the financial planning membership includes investment strategy and planning services, and the adjustment avoids duplicative charges. Clients who are not enrolled in the financial planning program continue to be charged the standard wrap fee rates as set forth in the fee schedule. Please see Item 5 for complete details.



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## Item 4: Services, Fees and Compensation

Legacy Growth Wealth Management LLC, d/b/a Future Path Financial Planning, is an Investment Adviser principally located in the state of Florida. We are a limited liability company founded in April 2025. Legacy Growth Wealth Management LLC became registered in 2025. The firm conducts business under both its legal name, Legacy Growth Wealth Management LLC, and its doing-business-as name, Future Path Financial Planning. All advisory and financial planning services offered under either name are provided by the same firm and legal entity. Future Path Financial Planning can be found online at [www.futurepathplanning.com](http://www.futurepathplanning.com). Joshua Scannell is the principal owner and Chief Compliance Officer ("CCO"). Throughout this Brochure, Legacy Growth Wealth Management LLC d/b/a Future Path Financial Planning may be referred to as 'LGWM,' 'we,' 'us,' or 'our.'

### **Description of Our Services**

Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as risk tolerance and tax considerations.

We primarily advise our Clients regarding investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in Client's portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the Client's request.

When we provide investment management services, Clients grant us limited authority to buy and sell securities on a discretionary basis. More information on our trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions in writing on investing in certain securities, types of securities, or industry sectors.

### **Wrap Fee Program Fee Schedule**

The fee is based on a percentage of assets under management and is negotiable. The annualized fees for investment management services are based on the following fee schedule:

<b>Assets Under Management</b>	<b>Annual Advisory Fee</b>
<b>\$0 - \$1,000,000</b>	0.95%
<b>\$1,000,001 and Above</b>	0.85%

The annual advisory fee is paid monthly in arrears based on the average daily balance of the Client's account(s). The advisory fee is a blended tier. For example, for assets under management of \$2,000,000, a

Client would pay 0.95% on the first \$1,000,000 and 0.85% on the remaining balance. The formula for the monthly fee is determined by the following calculation:  $((\$1,000,000 \times 0.95\%) + (\$1,000,000 \times 0.85\%)) \div 12$ .

In determining the advisory fee, we may allow accounts of members of the same household to be aggregated. LGWM relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

We deduct our advisory fee from one or more account(s) held at an unaffiliated third-party custodian, as directed by the Client. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay by electronic funds transfer (EFT). We use an independent third party payment processor in which the Client can securely input their payment information to pay their fee. We do not have access to the Client's banking or credit information at any time. The Client will be provided with their own secure portal in order to make payments.

The Advisory Contract may be terminated with written notice 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination. Advisor does not charge any setup fees and/or termination fees.

If LGWM deducts its advisory fee from Client's account(s), the following safeguards will be applied:

- i. The Client will provide written authorization to LGWM, permitting us to be paid directly from Client's accounts held by the custodian.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements from the accounts, including the amount of the advisory fee.

LGWM will send an itemized invoice to the Client at the same time it instructs the custodian to debit the advisory fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

We urge you to carefully review custodial statements and compare them to the account invoices or reports that we may provide to you and notify us of any discrepancies. Clients are responsible for verifying the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility. Our invoices or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Although clients may request that we execute transactions for their account through any broker-dealer of their choosing, we generally recommend that clients engage the custodial and brokerage services of Charles Altruist Financial LLC ("Altruist"), an unaffiliated broker-dealer, member FINRA/SIPC. The Client will ultimately make the final decision of the Custodian to be used to hold the Client's investments by signing the selected broker-dealer's account opening documentation.

In recommending broker-dealers, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into

consideration the full range of the broker-dealer's services. The factors we consider when evaluating a broker-dealer for best execution include, without limitation, the broker-dealer's:

- Execution capability;
- Commission rate;
- Financial responsibility;
- Responsiveness and customer service;
- Custodian capabilities;
- Research services/ancillary brokerage services provided; and
- Any other factors that we consider relevant.

Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.

For a full description of our brokerage practices, please see Item 12 in our ADV Part 2A, Firm brochure.

### **Active Financial Planning Member Fee Adjustment**

Clients who are actively enrolled in the Future Path Financial Planning Program and current on their monthly flat retainer fee are eligible for a reduced annual wrap fee of 0.80% of assets under management. This reduced rate reflects that the financial planning membership already includes investment strategy and planning services, and the adjustment is intended to avoid duplicative charges for overlapping advisory services.

The reduced wrap fee of 0.80% is contingent upon the client maintaining continuous, active enrollment and timely payment of the applicable financial planning retainer fee. Should the client's financial planning membership lapse, be canceled, or otherwise be discontinued, the client's annual wrap fee will be adjusted to the applicable standard rate as set forth in the wrap fee schedule above. Future Path Financial Planning will provide written notice to the client prior to any such fee adjustment.

Clients who do not participate in the Future Path Financial Planning Program will be charged the standard annual wrap fee as disclosed in the wrap fee schedule above.

### **Certain Conflicts of Interest Related to Wrap Fees**

The costs of our investment advice, together with the costs of all brokerage commissions and fees, custodial charges (except those related to custody of alternative investments), spreads, mark-ups and mark-downs, incurred in your account held at the Custodian will be absorbed by and are included within the Wrap Fee. LGWM will retain the remaining amount of the Wrap Fee you pay for our advisory services after our payment of all brokerage commissions incurred in your account. This may create a conflict of interest as we may have an incentive to trade your account less frequently, and/or to invest your account in assets that may be subject to waived or reduced brokerage commissions (if available), resulting in LGWM retaining a

greater portion of the Wrap Fee paid by the Client. To address the foregoing conflicts, we manage your account in strict accordance with your investment objectives and our ongoing fiduciary duty to you.

By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker. LGWM does not manage non-wrap accounts. While we believe our Wrap Fees to be reasonable for the services provided, lower fees for comparable services may be available from other sources.

### **Additional Costs and Expenses**

You may pay custodial fees (charges imposed directly by a mutual fund, index fund, or exchange-traded fund) which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, and other fees and taxes on brokerage accounts, securities transactions or fees for trades executed away from custodian. These fees are not included within the wrap fee you are charged by our firm.

We may invest clients in No Transaction Fee (NTF) funds when available. The NTF funds do not pay the custodian a ticket charge, unlike a regular fund; however, it does incur a higher expense ratio than normal funds. Because we offer our advisory services under a wrap program where we pay all ticket charges incurred, we have a financial interest to minimize these charges.

### **Referral Compensation**

We do not pay any referral fees or additional compensation of any kind with respect to referrals of clients to the Wrap Fee program.

## Item 5: Account Requirements and Types of Clients

We provide financial planning and investment management services to individuals and high net-worth individuals.

We do not have a minimum account size requirement to open or maintain an account.

## Item 6: Portfolio Manager Selection and Evaluation

### **Selection and Review of Portfolio Managers**

Investment management services are typically managed, directed, and performed exclusively by LGWM's in-house portfolio managers. Our portfolio managers are registered as investment advisor representatives of our firm and are retained based on their demonstrated skill and experience in managing client portfolios.

### **Conflicts of Interest Related to Use of In-House Portfolio Managers**

You should be aware that because our in-house portfolio managers will manage your account, we have an incentive to evaluate their performance more favorably than we might otherwise if they were not affiliated with our firm. Likewise, because your portfolio manager is affiliated with our firm, we have a disincentive to terminate their services to your account or to take other negative action as a result of their failure to perform to our expectations.

**Additional Disclosures Related to our Advisory Business; Performance-Based Fees and Side-by-Side Management; Methods of Analysis, Investment Strategies and Risk of Loss; and Voting of Client Securities**

See Item 4 of this Wrap Fee Program Brochure for information about our advisory business. We offer individualized investment advice to clients that matches their objectives and risk tolerance.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to LGWM in writing. LGWM will notify Clients if they are unable to accommodate any requests.

We do not charge any performance-based fees for our services or engage in side-by-side management of accounts.

A brief description of our methods of analysis and primary investment strategies are listed below.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be

difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

### **Modern Portfolio Theory (MPT)**

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Risks Associated with Modern Portfolio Theory: Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

**Mutual Fund and/or ETF Analysis:** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

## **Investment Strategies**

### **Asset Allocation**

In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over

time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target risk tolerance model.

### **Passive and Active Investment Management**

We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in Client's portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our Clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our Clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a Client's portfolio, but we strive to keep internal fund expenses as low as possible.

### **Long-term/Short-term purchases**

We purchase securities and generally hold them in the Client's account for a year or longer. Short-term purchases may be employed as appropriate when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

### **Material Risks Involved**

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio..

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and an ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Mutual Funds** When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

### **Voting Client Securities**

We do not vote client proxies. Therefore, the client maintains exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 7: Client Information Provided to Portfolio Manager

All accounts are managed by representatives of LGWM. LGWM does not use third-party portfolio managers.

## Item 8: Client Contact with Portfolio Manager

We encourage clients to contact us regularly and promptly to discuss any such changes by calling the number on this Brochure.

## Item 9: Additional Information

### **Disciplinary Information & Other Financial Industry Activities and Affiliations**

LGWM and its management have no disciplinary information to disclose.

Joshua Scannell is currently a licensed insurance agent, however, he no longer sells any insurance products, and is not affiliated with any insurance companies. Joshua Scannell will not sell any insurance products to

clients or prospective clients of LGWM. Besides the aforementioned, neither LGWM or its management personnel have other financial industry activities and/or affiliations to disclose.

LGWM does not recommend Clients to other investment advisers to manage their accounts.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

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

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

#### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

#### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of

Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by LGWM's Chief Compliance Officer in advance of the transaction in an account. LGWM maintains a copy of access persons' personal securities transactions as required.

### **Trading Securities At/Around the Same Time as Client's Securities**

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients' accounts in the purchase or sale of securities.

### **Review of Accounts**

#### **Periodic Reviews**

Joshua Scannell, Founder and CCO of LGWM, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. LGWM does not provide specific reports to Clients, other than financial plans. Clients who engage us for investment management services will have their account(s) reviewed regularly on a quarterly basis by Joshua Scannell, Founder and CCO. The account(s) are reviewed with regards to the Client's investment objectives and risk tolerance levels.

#### **Triggers of Reviews**

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

#### **Review Reports**

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

LGWM does not provide written performance or holdings reports to Investment Management Clients outside of what is provided directly by their custodian.

### **Client Referrals**

#### **Compensation Received by Legacy Growth Wealth Management LLC**

LGWM is a fee-only firm that is compensated solely by its Clients. LGWM does not receive commissions or other sales-related compensation. Except as mentioned in Item 4 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

#### **Client Referrals from Solicitors**

LGWM does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

### **Financial Information**

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition.

LGWM does not require or solicit prepayment of more than \$500 in fees per Client six months in advance. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

## Item 10 Requirements for State-Registered Advisors

Legacy Growth Wealth Management LLC, nor any management person including Joshua Scannell, have any relationship or arrangement with issuers of securities.