



**FAMILY**  
LEGACY INC.

**Form ADV Part 2A Brochure**

**February 24, 2023**

Family Legacy, Inc.

900 Pendleton St.,

Suite 200

Greenville, SC 29601

864-233-0808

[www.familylegacyinc.com](http://www.familylegacyinc.com)

This Brochure provides information about the qualifications and business practices of Family Legacy, Inc. If you have any questions about the contents of this Brochure, or would like to request a copy free of charge, please contact Patrice L. Sebastian at 864-233-0808 or [psebastian@familylegacyinc.com](mailto:psebastian@familylegacyinc.com).

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.

Family Legacy, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Family Legacy, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Item 2 – Material Changes**

These are the following material changes in this brochure from the last annual updating amendment of Family Legacy, Inc on March 4 , 2022. Material changes relate to Family Legacy, Inc's policies, practices or conflicts of interests.

The firm has added the custodian Charles Schwab due to the TD / Schwab merger. (Items 12 & 14)

Family Legacy, Inc. | **2023**

Form ADV Part 2A

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#### Item 4 - Advisory Business

Family Legacy, Inc. has been serving clients since May of 1995. The advisory firm is owned by Christopher A. Brown. William W. Brown, the founder of the business continues to take an active role in the business. Together, they form a father and son team that has backgrounds in tax and accounting. Both are Certified Public Accountants and Personal Financial Specialists. Christopher A. Brown is authorized by the Certified Financial Planner Board of Standards (CFP Board) to use the CERTIFIED FINANCIAL PLANNER™ and CFP® certification marks in accordance with CFP Board certification and renewal requirements.

Family Legacy, Inc. provides portfolio management and financial planning services. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, Family Legacy, Inc. develops a client's personal investment policy and creates and manages a portfolio based on that policy. Our firm enters into a portfolio management agreement with all clients making investment decisions for the account according to the investment objectives and financial circumstances as shown in the client's investment policy statement.

Family Legacy, Inc. provides this service to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and corporations. Family Legacy, Inc. primarily manages advisory accounts on a discretionary basis. Factors considered in making investment decisions include the account size, risk tolerance and the client's investment experience and any other pertinent information discussed with a client during consultation or in the process of developing the client's investment policy.

Family Legacy, Inc. assists each client in determining the amount of risk versus return in various investment vehicles and helps the client in allocating his or her assets between the various asset classes.

Family Legacy, Inc. will maintain periodic and appropriate communication with the client. Family Legacy, Inc. monitors the performance of the account and continually assesses the client's risk tolerance and changes the asset allocation as necessary.

Family Legacy, Inc. manages money on a discretionary basis in primarily two ways.

Since the company's inception, the company has utilized individually managed accounts, which for larger accounts (typically a minimum account size of \$250,000), have been primarily made up of individually traded securities.

For individually managed accounts, our philosophy is conservative and emphasizes high-quality, high-yielding stocks and other large-cap stocks for the majority of portfolio assets. We also use mid-cap and other stocks to a lesser degree. Government bonds, preferred stocks, convertible securities, real estate investment trusts, no-load mutual funds, exchange traded funds and other investment vehicles are utilized to achieve greater diversification and to include international investing and other fixed instruments. Mutual funds and exchange traded funds will be selected on the basis of any or all of the following criteria: The fund's performance history, the industry sector in which the fund invests, the track record of the fund's manager, the fund's investment objectives, the fund's management style and philosophy and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the clients' behalf. Clients will retain individual ownership of all securities.

Family Legacy, Inc. also offers asset allocation portfolios consisting of no-load mutual funds, exchange traded funds and other pooled investment vehicles within Family Legacy, Inc.'s discretion. The use of no-load mutual funds, ETFs and other pooled investment vehicles allows Family Legacy, Inc. to diversify accounts through the use of these investments rather than the selection of individual stocks, bonds and other securities described above. Accounts that are smaller than those accepted by Family Legacy, Inc. as separately managed accounts described above may be accepted as asset allocation portfolios. In all cases, minimum account size is negotiable.

Asset allocation portfolios using mutual funds, ETFs and other pooled investment vehicles may be used for any size account depending on the client's preferences and circumstances.

Family Legacy, Inc.'s asset allocation portfolios are constructed as model portfolios of mutual funds, ETFs and other pooled investment vehicles. Client assets are managed according to a model that is suitable to the client's individual investment objectives, risk tolerance and financial circumstances. Clients may place reasonable restrictions on assets selected by Family Legacy, Inc. for implementation of the client's portfolio.

Family Legacy, Inc. also provides advisory services to participant-directed employee retirement benefit plans on a non-discretionary basis. Adviser will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed.

Family Legacy, Inc. will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

Family Legacy, Inc. will recommend changes in the plan's investment vehicles as may be appropriate from time to time and will review the plan's investment vehicles and investment policy as necessary.

Family Legacy, Inc. will generally engage new clients in a discovery process to define goals and explore a client's values as they relate to their personal financial situation. We will also meet with clients on a periodic basis to review and update their individual financial plan as appropriate.

Family Legacy, Inc. may offer investment advice and financial planning services on a consultation basis. Fees are charged on a fixed-fee basis, and a range of the fees to be charged for these services are agreed upon before the work commences. In the client engagement letter, an actual schedule of fees and dates to be paid are included. The client may terminate these services at any time and get a full refund of any unearned portion of the fees upon written request.

#### Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

As of December 31, 2022, Family Legacy managed for clients and related parties \$240,162,184 million dollars under discretionary management. The Firm advised on another \$ \$ 19,773,564 million dollars of non-discretionary assets.

#### Item 5 – Fees and Compensation

Family Legacy, Inc. uses the following fee schedules for assets under management and ongoing financial planning in its individually managed accounts.

##### Value of Account Annual Fee

0 - \$3 Million	1.5%
Next \$5 Million	1.25%
Greater than \$8 Million	1.0%

Family Legacy, Inc. charges a management fee on asset allocation portfolios that is less than the fee charged for separately managed accounts on account values above \$250,000. While fees on these portfolios paid to Family Legacy, Inc. may be lower, aggregate fees paid by the client may be higher than individually managed portfolios because of expense ratios charged by the pooled investment vehicles paid by the end client. Asset allocation portfolios are not specifically tax-managed, which Family Legacy, Inc. provides for taxable separately managed accounts.

Family Legacy, Inc. uses the following fee schedules for assets under management and ongoing financial planning in its asset allocation portfolios.

**Value of Account Annual Fee**

\$0 - \$500,000	1.50%
Next \$500,000	1.25%
Next \$2,000,000	1.00%
Amounts greater than \$3,000,000	.75%

Fees are generally payable quarterly in advance. The initial billing period starts upon the receipt of any funds or securities in the account. The first payment will be prorated to cover the period from the date the account is funded through the end of the current full calendar quarter. Clients will be invoiced in advance at the beginning of each calendar quarter based upon the value of the account at the end of the previous quarter. In limited situations, fees are negotiable. If a portfolio management agreement is terminated within five days of execution, fees are completely refunded. If a portfolio management agreement is otherwise terminated, refunds are made on a pro-rata basis upon written request.

Family Legacy, Inc. uses the following fee schedules for non-discretionary advisory services performed for employee directed retirement plans.

**Value of Account Annual Fee**

0-\$5,000,000	.5%
Next \$5,000,000	.35%
Amounts greater than \$10,000,000	.25%

Non-discretionary fees for employee directed retirement plans are billed quarterly in arrears. In limited situations, fees are negotiable.

All fees paid to Family Legacy, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without the services of Family Legacy, Inc. In that case, the client would not receive the services provided by Family Legacy, Inc., which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition or objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Family Legacy, Inc. to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisor services being provided. Additionally, the custodian used will typically charge a nominal fee on a per-trade basis.

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Family Legacy, Inc.'s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Such charges, fees, and commissions are exclusive of and in addition to Family Legacy, Inc.'s fee, and Family Legacy, Inc. shall not receive any portion of these commissions, fees and costs.

Fees and account size are negotiable. For smaller accounts Family Legacy will generally ask that the client enter a periodic investment plan where the client adds an automatic deposit to the account on a regular basis.

We charge a fixed fee for initial consultation which generally includes financial planning services based on an agreed upon amount decided with the client before beginning the engagement. In most initial cases, the client will agree to an engagement letter. In the client engagement letter, an actual schedule of fees and dates to be paid are included. For on-going consultation or special projects the client may request to be billed as the work progresses. The client may terminate these services at any time and receive a full refund of any unearned portion of the fees upon written request.

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

Family Legacy, Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Item 7 – Types of Clients**

Family Legacy, Inc. provides portfolio management services to individuals, high net worth individuals, corporate, pension and profit-sharing plans, charitable organizations, trusts, estates and corporations.

The minimum size for new individually managed accounts is \$250,000. However, Family Legacy, Inc., under certain circumstances, will negotiate this minimum account size. This minimum account size will apply to new accounts and will not change the status for existing accounts. There is no minimum account size for an asset allocation portfolio.

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

For individually managed accounts Family Legacy utilizes common stocks, ADR's, REIT's, bonds, mutual funds, ETF's, publicly traded limited partnerships, and other publicly traded instruments to build portfolios based on each client's individual risk tolerance.

We generally hold securities over a long period of time and seek capital appreciation in conjunction with income to create long-term sustainable growth. Our style is that of long-term investors seeking stability with reasonable returns. We do not hold ourselves out as traders. We are an investment firm seeking wise investments over a long period of time.

For asset management portfolios, we search for no load funds with no transaction fees and reasonable expense ratios that are generally rated three stars and greater in Morningstar. We also seek to utilize high quality exchange traded funds (ETFs). We work diligently to design portfolios that will fit within a clients stated risk tolerance.

For individually directed retirement plans, we recommend high quality mutual funds and exchange traded funds that will meet the plan's objectives as outlined in their investment policy statement.

In all of our portfolios, we seek to minimize risk. Philosophically, we are willing to let go of some returns on the upside in the attempt to mitigate downside risk. Our portfolios tend to be more conservative rather than aggressive.

We use a variety of research sources such as mutual fund prospectuses, Morningstar, Y-Charts, Fi360 and others to search, evaluate, and review investments. While we make every effort to design portfolios that will meet our client's goals, investing in securities involves risk of loss that clients should be prepared to bear. Prior rates of return are not guaranteed in future periods.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Family Legacy, Inc. or the integrity of its management. Family Legacy, Inc. has no information applicable to this Item.

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

Family Legacy, Inc. is commonly associated with Family Legacy Business Services, Inc., formerly William W. Brown, CPA, PA. William W. Brown began the CPA firm in 1977, and the firm continues to operate. Christopher A. Brown, CPA, PFS, CFP® currently owns the CPA firm. William W. Brown, CPA, PFS, Vice President of Family Legacy, Inc., and Christopher A. Brown, CPA, PFS, President and

CIO of Family Legacy, Inc., are actively involved in personal financial counseling, estate planning, and to a lesser degree, traditional income tax services.

Approximately twenty percent (20%) of the available time for William W. Brown is spent directly with Family Legacy, Inc., and approximately ninety percent (90%) of the time of Christopher A. Brown, is spent directly in Family Legacy, Inc.

In August 2005, William W. Brown and Christopher A. Brown formed Legacy Insurance, LLC to seek independent solutions to insurance issues, and are licensed as independent insurance agents. During the course of providing investment advisory services and financial planning services, we may recommend insurance products to fulfill clients' needs and introduce clients to insurance brokers for the purchase of insurance products. If a client elects to purchase any insurance product, we may receive insurance commissions that are separate and distinct from the advisory fee of Family Legacy, Inc. However, clients are not under any obligation to engage these individuals when considering implementation of recommendations. The implementation of any or all insurance product recommendations is solely at the discretion of the client.

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

#### Statement of General Policy

This Code of Ethics (“Code”) has been adopted by Family Legacy, Inc. and is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 (“Advisers Act”). This Code establishes rules for all employees of Family Legacy, Inc. and is designed to, among other things, govern personal securities trading activities in the accounts of employees. The Code is based upon the principal that Family Legacy, Inc. and its employees owe a fiduciary duty to Family Legacy, Inc.’s clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by Family Legacy, Inc. continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

Pursuant to Section 206 of the Advisers Act, both Family Legacy, Inc. and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that Family Legacy, Inc. has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

Family Legacy, Inc. and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- The duty to have a reasonable, independent basis for the investment advice provided;
- The duty to obtain best execution for a client's transactions where the Firm is in a position to direct brokerage transactions for the client;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs and circumstances; and
- A duty to be loyal to the clients.

In meeting its fiduciary responsibilities to its clients, Family Legacy, Inc. expects every employee to demonstrate the highest standards of ethical conduct for continued employment with Family Legacy, Inc. Strict compliance with the provisions of the Code shall be considered a basic condition of employment with Family Legacy, Inc.

Family Legacy, Inc.'s reputation for fair and honest dealing with its clients has taken considerable time to build. This standing could be seriously damaged as the result of even a single securities transaction being considered questionable in light of the fiduciary duty owed to our clients. Employees are urged to seek the advice of Patrice Sebastian, the Chief Compliance Officer, for any questions about the Code or the application of the Code to their individual circumstances. Employees should also understand that a material breach of the provisions of the Code may constitute grounds for disciplinary action, including termination of employment with Family Legacy, Inc.

The provisions of the Code are not all-inclusive. Rather, they are intended as a guide for employees of Family Legacy, Inc. in their conduct. In those situations where an employee may be uncertain as to the intent or purpose of the Code, he/she is advised to consult with Patrice Sebastian. Patrice Sebastian may grant exceptions to certain provisions contained in the Code only in those situations when it is clear beyond dispute that the interests of our clients will not be adversely affected or compromised.

All questions arising in connection with personal securities trading should be resolved in favor of the client even at the expense of the interests of employees.

A complete copy of our Code of Ethics is available to clients or prospective clients at your request.

## Item 12 - Brokerage Practices

For discretionary individually managed accounts, Family Legacy, Inc. requests that it be provided with written authority to determine which securities and the amounts of securities are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

Clients in need of brokerage and custodial services may have Fidelity Brokerage Services, Inc., TD Ameritrade, Inc and Charles Schwab & Co., Inc. Advisor Services. recommended to them. Family Legacy, Inc. receives benefits that it would not receive if it did not offer investment advice and utilize these firms as custodians.

Family Legacy, Inc. may utilize block trades where possible and when advantageous to clients. The blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. Block trading allows Family Legacy, Inc. to execute equity trades in a more-timely, more-equitable manner. However, no transactions by directors, officers or employees of Family Legacy, Inc. will be included in a client block unless said trade meets a de minimis exemption, involving less than 1,000 shares in a one-month period, in an issuer with a market capitalization of \$3 billion or greater. Block trades executed at TD Ameritrade, Fidelity Investments and Charles Schwab will be placed at different times.

Generally, orders are created in our portfolio accounting system, uploaded to Fidelity or TD Ameritrade and sent by them to the Markets. Orders placed through Fidelity's electronic trading system are sent directly to the Markets via Fidelity's computer system. Orders placed through TD Ameritrade's electronic trading system are sent directly to the Markets via TD Ameritrade's computer system. Orders sent first do not necessarily trade first nor do these orders necessarily execute at terms more or less favorable than orders sent later.

Family Legacy, Inc. utilizes the services of Fidelity Brokerage Services, Inc., TD Ameritrade Institutional and Charles Schwab. While there is no direct linkage between the investment advice given to clients and Family Legacy, Inc.'s participation in Fidelity's programs or TD Ameritrade's programs, economic benefits are received by Family Legacy, Inc. which would not be received if Family Legacy, Inc. did not give investment advice to clients. These benefits do not depend on the amount of transactions directed by Family Legacy, Inc. to Fidelity, TD Ameritrade and Charles Schwab.

These benefits include: A dedicated trading desk that services advisors exclusively, a dedicated service group and an account services manager dedicated to Family Legacy, Inc.'s accounts, access to a real-time order matching system, ability to "block" client trades, electronic download of trades, balances and positions in portfolio management software, access, for a fee, to an electronic

interface with custodial account software, duplicate and batched client statements, confirmations and year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with the federal and state requirements), quarterly newsletters, access to various mutual funds, many funds NOT affiliated with Fidelity, TD Ameritrade and Charles Schwab, ability to have loads waived for Family Legacy, Inc.'s clients who invest in certain loaded funds, when certain conditions are met and maintained and the ability to have custody fees reduced or waived (when negotiated by the advisor and allowed under certain circumstances).

Family Legacy, Inc. also receives certain vendor discounts on software as part of doing business with Fidelity, TD Ameritrade and Charles Schwab. Family Legacy, Inc. will always act in the best interest of its clients, consistent with its fiduciary duty, including when evaluating custodians/broker-dealers. Moreover, Family Legacy, Inc. recommends custodians/ broker-dealers based on its duty to seek "best execution," which has the obligation to seek to execute securities transactions clients, consistent with its fiduciary duty, including accurate execution, prompt reconciliation, and trade error resolution, competitive commission costs, access to low transaction fee ETFs, and professionalism that ultimately benefits our clients. While Family Legacy, Inc. has a reasonable belief that Fidelity, TD Ameritrade and Charles Schwab are able to obtain best execution and competitive prices, Family Legacy, Inc. will not be independently seeking best execution price capability through other broker-dealers.

We periodically review best execution reports as provided by Fidelity, TD Ameritrade and Charles Schwab to reevaluate custodial performances.

Family Legacy, Inc. reserves the right to decline acceptance of a broker dealer other than Fidelity Investments, TD Ameritrade and Charles Schwab, if Family Legacy, Inc. believes that this would adversely affect Family Legacy, Inc.'s duty to obtain best execution.

For non-discretionary employee retirement plan services, Family Legacy does not arrange for the execution of securities transactions for employee retirement benefit plans as part of this service. Transactions are executed directly through employee plan participation and the services of the TPA selected by the plan sponsor.

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

Discretionary portfolio management accounts are reviewed in their entirety initially upon engagement and quarterly, semi-annually or annually thereafter. Periodic reviews with the clients to review their individual performance, monitor risk tolerance and change asset allocation, as determined by client.

Non-discretionary employee benefit retirement plan assets are reviewed on an annual basis.

For discretionary portfolio management accounts, reports are prepared and delivered quarterly. For non-discretionary retirement plan advice, periodic reports and online access are provided by the plan administrator.

**Reviewers:**

George Jester

Jennifer W. Chandler CFP®, COO

Patrice L. Sebastian, CPA/CFF, CVA, CCO, CFP®

Christopher A. Brown, CPA, PFS, CFP® President

William W. Brown, CPA, PFS, Vice President

Christopher A. Brown and/or William W. Brown review all accounts.

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

Family Legacy, Inc. has no active solicitor relationships.

As is customary with custodial relationships Charles Schwab & Co., Inc. Advisor Services provides Family Legacy, Inc with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services 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 Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, 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 Family Legacy, Inc client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to Family Legacy, Inc other products and services that benefit Family Legacy, Inc but may not benefit its clients' accounts. These benefits may include national, regional or Family Legacy, Inc specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Family Legacy, Inc by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Family Legacy, Inc in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Family Legacy, Inc's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client

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reporting. Many of these services generally may be used to service all or some substantial number of Family Legacy, Inc's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to Family Legacy, Inc other services intended to help Family Legacy, Inc manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to Family Legacy, Inc by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive 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 Family Legacy, Inc. Family Legacy, Inc is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

### Item 15 - Custody

Family Legacy, Inc. is not a corporate trustee and does not act as a custodian for client funds or securities. However, when requested by clients, William W. Brown or Christopher A. Brown will act as trustee or personal representative on a client's behalf which constitutes custody under the Advisers Act. As part of the safeguarding requirements for the funds and securities over which it has custody (beyond constructive custody via direct fee deduction), Family Legacy, Inc. has retained an independent public accountant to conduct an annual surprise examination of these assets.

All clients receiving portfolio management services should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Family Legacy, Inc. urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Should you note any discrepancy including failure to receive a periodic statement, please call Patrice Sebastian, the Chief Compliance Officer, at 864-233-0808.

**Item 16 – Investment Discretion**

Family Legacy, Inc. usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Family Legacy, Inc. observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to Family Legacy, Inc. in writing.

**Item 17 – Voting Client Securities**

Family Legacy, Inc. will exercise proxy voting authority for clients who agree to participate in the proxy voting services offered by Broadridge, Inc. We believe that this service provides the most consistent and thorough methodology of voting in shareholder interests. We will not exercise proxy voting authority for clients who do not wish to participate in this service. Clients may opt out of this service at no cost. Clients may request a complete copy of our proxy voting policy and procedures and records regarding how their proxy statements have been voted by contacting any of our firm's members. The cost of this service is born by the advisor. There is no additional cost to the client.

Clients may obtain a copy of Family Legacy's complete proxy voting policies and procedures upon request. Clients may also obtain information from Family Legacy, Inc. on how any proxies were voted on behalf of their account(s).

Family Legacy, Inc. also has an agreement with Broadridge, Inc. to process and administer an asset recovery service covering Global Securities Class Action lawsuits for its clients. As payment for this service, Broadridge will receive a fee of 20% of the total reimbursement of any securities class action settlement it collects. Broadridge will then distribute the remaining funds collected directly to eligible clients for each class action settlement.

**Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about an adviser’s financial condition. Family Legacy, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

*This brochure supplement provides information about Christopher Aristotle Brown that supplements the Family Legacy, Inc. brochure. You should have received a copy of that brochure. Please contact Christopher Aristotle Brown if you did not receive Family Legacy, Inc.'s brochure or if you have any questions about the contents of this supplement.*

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

## **Family Legacy, Inc.**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Christopher Aristotle Brown**

Personal CRD Number: 2627553

Investment Adviser Representative

Family Legacy, Inc.  
900 Pendleton St.  
Suite 200  
Greenville, SC 29601  
(864) 233-0808  
[cbrown@familylegacyinc.com](mailto:cbrown@familylegacyinc.com)

UPDATED: 05/27/2020

## Item 2: Educational Background and Business Experience

**Name:** Christopher Aristotle Brown      **Born:** 1972

### **Educational Background and Professional Designations:**

#### **Education:**

B. S. Business Administration, College of Charleston – 1994

B.S. Accounting – College of Charleston – 1995

#### **Professional Designations:**

Certified Public Accountant – 1997

Personal Financial Specialist – 1999

Exam Series 65: Uniform Investment Adviser Examination

S.C. Life, Accident/Health – 2003

Certified Financial Planner™ - 2013

#### **Business Background:**

1995 – Present:                      Family Legacy, Inc. – President, Chief Investment Officer and Stockholder

1995 – Present:                      Family Legacy Business Services, Inc. – CPA and Owner

2005 – Present:                      Legacy Insurance, LLC - Owner

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

#### **Item 4: Other Business Activities**

Christopher Aristotle Brown is owner and manager of Family Legacy Business Services, Inc., formerly William W. Brown, CPA, PA, a CPA firm founded in 1977 by his father William W. Brown, CPA, PFS. The CPA Firm's primary function is to prepare tax returns and provide other consulting and accounting services to clients of Family Legacy, Inc.

Christopher Aristotle Brown is a member of Legacy Insurance, LLC, an insurance agency founded in 2005 to provide independent insurance services to clients of Family Legacy, Inc.

#### **Item 5: Additional Compensation**

Christopher Aristotle Brown receives health insurance benefits for himself and his family and some educational support from Family Legacy, Inc.

Christopher Aristotle Brown receives commissions from insurance products placed through Legacy Insurance, LLC. Clients are under no obligation to purchase insurance through Legacy Insurance, LLC.

Christopher Aristotle Brown receives trustee fees from some clients of Family Legacy, Inc. when acting as trustee.

#### **Item 6: Supervision**

As a representative of Family Legacy, Inc., Christopher Aristotle Brown is supervised by Patrice Sebastian, the firm's Chief Compliance Officer. Patrice Sebastian is responsible for ensuring that Christopher Aristotle Brown adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Patrice Sebastian is (864) 233-0808.

*This brochure supplement provides information about Patrice Lynn Sebastian that supplements the Family Legacy, Inc. brochure. You should have received a copy of that brochure. Please contact Patrice Lynn Sebastian if you did not receive Family Legacy, Inc.'s brochure or if you have any questions about the contents of this supplement.*

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

## **Family Legacy, Inc.**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Patrice Lynn Sebastian**

Personal CRD Number: 6635364

Investment Adviser Representative

Family Legacy, Inc.  
900 Pendleton St.  
Suite 200  
Greenville, SC 29601  
(864) 233-0808  
[psebastian@familylegacyinc.com](mailto:psebastian@familylegacyinc.com)

UPDATED: 05/27/2020

## Item 2: Educational Background and Business Experience

**Name:** Patrice Lynn Sebastian

**Born:** 1956

### **Educational Background and Professional Designations:**

#### **Education:**

B.S. Business Administration – College of Charleston – 1994

B.S. Accounting – College of Charleston - 1994

MBA – Francis Marion University – 2002

#### **Professional Designations:**

Certified Public Accountant – 1996

Certified Valuation Analyst – 2001

Certified in Financial Forensics - 2008

Exam Series 65: Uniform Investment Adviser Law Examination

SC Life, Accident/Health – 2016

Certified Financial Planner™ - 2019

#### **Business Background:**

2016 – Present	Chief Compliance Officer and Investment Adviser Representative Family Legacy, Inc.
2016 – Present	CPA, Director of Forensic and Valuation Services Family Legacy Business Services, Inc.
2016 – Present	Independent Contractor Legacy Insurance, LLC
2000 – 2016	Director, Forensic and Valuation Services Group WebsterRogers, LLP

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Patrice Lynn Sebastian is an accountant employed by related entity Family Legacy Business Services, Inc. From time to time, she will offer clients advice through this activity. Family Legacy, Inc. and Family Legacy Business Services, Inc. always act in the best interest of the client. Clients are in no way required to utilize the services of any representative of Family Legacy Business Services, Inc. in their capacity as an accountant.

Patrice Lynn Sebastian is an independent contractor of Legacy Insurance, LLC, an insurance agency founded in 2005 to provide independent insurance services to clients of Family Legacy, Inc.

### **Item 5: Additional Compensation**

Patrice Lynn Sebastian receives some insurance premium reimbursement and educational support from Family Legacy Business Services, Inc. The CPA Firm collects periodic professional fees from Family Legacy, Inc. to adequately compensate for these services.

Patrice Lynn Sebastian receives commissions from insurance products placed through Legacy Insurance, LLC. Clients are under no obligation to purchase insurance through Legacy Insurance, LLC.

### **Item 6: Supervision**

As a representative of Family Legacy, Inc., Patrice Lynn Sebastian is supervised by Christopher Brown, the firm's President and Chief Investment Officer. Christopher Brown is responsible for ensuring that Patrice Lynn Sebastian adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Christopher Brown is (864) 233-0808

*This brochure supplement provides information about Jennifer Wilson Chandler that supplements the Family Legacy, Inc. brochure. You should have received a copy of that brochure. Please contact Jennifer Wilson Chandler if you did not receive Family Legacy, Inc.'s brochure or if you have any questions about the contents of this supplement.*

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

## **Family Legacy, Inc.**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Jennifer Wilson Chandler**

Personal CRD Number: 6756762

Investment Adviser Representative

Family Legacy, Inc.  
900 Pendleton St.  
Suite 200  
Greenville, SC 29601  
(864) 233-0808  
[jwilson@familylegacyinc.com](mailto:jwilson@familylegacyinc.com)

UPDATED: 05/27/2020

## Item 2: Educational Background and Business Experience

**Name:** Jennifer Wilson Chandler      **Born:** 1981

### **Educational Background and Professional Designations:**

#### **Education:**

Bachelor's Business Administration, Anderson University – 2007

Exam Series 65: Uniform Investment Adviser Law Examination

#### **Business Background:**

09/2016 - Present                      Chief Operating Officer, Family Legacy, Inc.

07/2011 - 09/2016                      Employee Relations Manager  
Orianna Health Systems

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Jennifer Wilson Chandler is not engaged in any investment-related business or occupation (other than this advisory firm).

## Item 5: Additional Compensation

Jennifer Wilson Chandler does not receive any economic benefit from any person, company, or organization, other than Family Legacy, Inc. in exchange for providing clients advisory services through Family Legacy, Inc..

## **Item 6: Supervision**

As a representative of Family Legacy, Inc., Jennifer Wilson Chandler is supervised by Patrice Sebastian, the firm's Chief Compliance Officer. Patrice Sebastian is responsible for ensuring that Jennifer Wilson Chandler adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Patrice Sebastian is (864) 233-0808.

*This brochure supplement provides information about William Wilkins Brown that supplements the Family Legacy, Inc. brochure. You should have received a copy of that brochure. Please contact William Wilkins Brown if you did not receive Family Legacy, Inc.'s brochure or if you have any questions about the contents of this supplement.*

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

## **Family Legacy, Inc.**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **William Wilkins Brown**

Personal CRD Number: 2627550

Investment Adviser Representative

Family Legacy, Inc.  
900 Pendleton St.  
Suite 200  
Greenville, SC 29601  
(864) 233-0808  
[psebastian@familylegacyinc.com](mailto:psebastian@familylegacyinc.com)

UPDATED: 05/27/2020

## Item 2: Educational Background and Business Experience

**Name:** William Wilkins Brown

**Born:** 1945

### **Educational Background and Professional Designations:**

#### **Education:**

B. S. Business Administration, The Citadel – 1971

#### **Professional Designations:**

Certified Public Accountant – 1977

Personal Financial Specialist – 1993

Exam Series 65: Uniform Investment Adviser Examination

S.C. Life, Accident/Health - 2003

#### **Business Background:**

1977–2013

Family Legacy Business Services, Inc.  
f/k/a William W. Brown, CPA, PA – CPA  
and Owner

1995 - Present

Family Legacy, Inc. – Vice President

2005 – Present

Legacy, Insurance, LLC – Member

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

William Wilkins Brown is President of Campbell Young Leaders, Inc., whose primary purpose is to serve underserved youth through charter school education, scholarships,

cultural exposure and management of educational facilities. William Wilkins Brown receives compensation for serving as president of Campbell Young Leaders, Inc.

William Wilkins Brown is a member of Legacy Insurance, LLC, an insurance agency founded in 2005 to provide independent insurance services to clients of Family Legacy, Inc.

### **Item 5: Additional Compensation**

William Wilkins Brown receives commissions from insurance products placed through Legacy Insurance, LLC. Clients are under no obligation to purchase insurance through Legacy Insurance, LLC.

William Wilkins Brown receives trustee fees from some clients of Family Legacy, Inc. when acting as trustee.

William Wilkins Brown has received fees for acting as personal representative for clients of Family Legacy, Inc.

### **Item 6: Supervision**

As a representative of Family Legacy, Inc., William Wilkins Brown is supervised by Patrice Sebastian, the firm's Chief Compliance Officer. Patrice Sebastian is responsible for ensuring that William Wilkins Brown adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Patrice Sebastian is (864) 233-0808.

*This brochure supplement provides information about Justin Tedford Phillips that supplements the Family Legacy, Inc. brochure. You should have received a copy of that brochure. Please contact Justin Tedford Phillips if you did not receive Family Legacy, Inc.'s brochure or if you have any questions about the contents of this supplement.*

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

**Family Legacy, Inc.**  
Form ADV Part 2B – Individual Disclosure Brochure  
*for*  
**Justin Tedford Phillips**  
Personal CRD Number: 7495490  
Investment Adviser Representative

Family Legacy, Inc.  
900 Pendleton Street Suite 200  
Greenville, SC 29601  
(864) 233-0808  
[jphillips@familylegacyinc.com](mailto:jphillips@familylegacyinc.com)

UPDATED: 02/05/2022

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

**Name:** Justin Tedford Phillips      **Born:** 1982

### **Educational Background and Professional Designations:**

#### **Education:**

Masters of Taxation Tax, University of Mississippi - 2006

Bachelors of Accountancy Accounting, University of Mississippi - 2005

#### **Business Background:**

03/2022 - Present	Investment Adviser Representative Family Legacy, Inc.
10/2021 - Present	Senior Business & Tax Services Family Legacy Business Services, Inc.
12/2020 - 10/2021	Accounting & Tax Manager Stokes & Company CPAs
01/2017 - 12/2020	Tax Manager Bradshaw, Gordon & Clinkscales
07/2016 - 01/2017	Math Teacher Greenville County Schools
07/2011 - 06/2016	Tax Manager Bradshaw, Gordon & Clinkscales

## **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## **Item 4: Other Business Activities**

Justin Tedford Phillips is an accountant employed by related entity Family Legacy Business Services, Inc. From time to time, he will offer clients advice through this activity. Family Legacy, Inc. and Family Legacy Business Services, Inc. always act in the best interest of the client. Clients are in no way required to utilize the services of any representative of Family Legacy Business Services, Inc. in their capacity as an accountant.

## **Item 5: Additional Compensation**

Justin Tedford Phillips receives educational support from Family Legacy Business Services, Inc. The CPA Firm collects periodic professional fees from Family Legacy, Inc. to adequately compensate for this support.

## **Item 6: Supervision**

As a representative of Family Legacy, Inc., Justin Tedford Phillips is supervised by Patrice L Sebastian, the firm's Chief Compliance Officer. Patrice L Sebastian is responsible for ensuring that Justin Tedford Phillips adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Patrice L Sebastian is (864) 233-0808.

*This brochure supplement provides information about Alyssa Standard Book that supplements the Family Legacy, Inc. brochure. You should have received a copy of that brochure. Please contact Alyssa Standard Book if you did not receive Family Legacy, Inc.'s brochure or if you have any questions about the contents of this supplement.*

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

**Family Legacy, Inc.**  
Form ADV Part 2B – Individual Disclosure Brochure  
*for*  
**Alyssa Standard Book**  
Personal CRD Number: 7511442  
Investment Adviser Representative

Family Legacy, Inc.  
900 Pendleton Street Suite 200  
Greenville, SC 29601  
(864) 523-8989  
[abook@familylegacyinc.com](mailto:abook@familylegacyinc.com)

UPDATED: 04/27/2022

## Item 2: Educational Background and Business Experience

**Name:** Alyssa Standard Book      **Born:** 1994

### **Educational Background and Professional Designations:**

#### **Education:**

Masters of Accountancy Accounting, University of Georgia - 2018  
Bachelor of Business Administration Accounting, University of Georgia - 2018

#### **Business Background:**

04/2022 - Present	Investment Adviser Representative Family Legacy, Inc.
11/2021 - Present	Tax and Compliance Professional Family Legacy Business Services Inc
01/2019 - 10/2021	Senior Accountant Cherry Bekaert
06/2018 - 11/2018	Cast Member Walt Disney Company
01/2011 - 05/2018	Student University of Georgia

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Alyssa Standard Book is an accountant employed by related entity Family Legacy Business Services, Inc. From time to time, she will offer clients advice through this activity. Family Legacy, Inc. and Family Legacy Business Services, Inc. always act in the best interest of the client. Clients are in no way required to utilize the services of any representative of Family Legacy Business Services, Inc. in their capacity as an accountant.

## **Item 5: Additional Compensation**

Alyssa Standard Book receives educational support from Family Legacy Business Services, Inc. The CPA Firm collects periodic professional fees from Family Legacy, Inc. to adequately compensate for this support.

## **Item 6: Supervision**

As a representative of Family Legacy, Inc., Alyssa Standard Book is supervised by Patrice Sebastian, the firm's Chief Compliance Officer. Patrice Sebastian is responsible for ensuring that Alyssa Standard Book adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual