

Item 1. Introduction

Saperston Legacy Advisors, Inc. (SLAI) is currently registered with the Securities and Exchange Commission (SEC) as an investment adviser. Investment Advisory and Brokerage services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals visit [investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationship and Services

What investment services and advice can you provide me?

We offer investment advisory services to retail clients. Our services include providing investment advice on an ongoing basis. Investment vehicles we utilize include mutual funds, exchange traded funds, closed end funds, stocks and bonds.

Monitoring – We monitor securities in accounts on an ongoing basis and is part of our standard service.

Investment Authority - We offer our services both on a *discretionary* and *non-discretionary* basis.

A discretionary account is one which allows SLAI to buy and sell investments in a retail investor's account, without asking the retail investor in advance. These services are provided on a perpetual basis. Our engagement will continue until you notify us otherwise in writing. **A non-discretionary account** is one where SLAI gives advice and the retail investor makes the ultimate decision regarding the purchase or sale of investments. **Limited Investment Offerings** – We do not offer advice with respect to proprietary products. One of our investment programs is limited to a mutual fund family of funds otherwise we do not adhere to a strictly limited menu of products or types of investments.

Account Minimums & Other Requirements – we do not require a minimum account size or investment amount.

For more detailed information on our relationships and services, please see Item 4 – Advisory Services and Item 7- Types of Clients of our ADV Part 2A.

Conversation Starter
<ul style="list-style-type: none"> Given my financial situation, should I choose an investment advisory service? Why or Why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Item 3. Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

You will pay an *ongoing asset-based fee* based on the value of cash and investments in the advisory account. Our fee is charged quarterly in advance. **Conflicts of Interest** - The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to encourage you to increase the assets in your account. **Other Fees and Costs** You may pay transaction-based fees when you buy and sell an investment (e.g. commissions paid to broker-dealers for buying or selling investments) in addition to the fees you pay to us for advisory services. You may also pay fees to a broker-dealer or bank that will hold your assets and that is called custody. You may also pay account maintenance fees to the custodian of the account. Some investments impose additional fees that will reduce the value of your investments over time such as mutual funds or variable annuities. You could be required to pay fees when certain investments are sold (e.g. surrender charges for selling variable annuities).

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

For more detailed information on our fees, please see Item 5 – Fees and Compensation of our Form ADV Part 2A.

Conversation Starter

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| <ul style="list-style-type: none">• Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? |
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What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means. ***The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to encourage you to increase the assets in your account.***

For more detailed information on our conflicts of interest please see Item 10 – Other Financial Industry Activities and Affiliations, Item 12 Brokerage Practices, Item 14 Client Referrals and Other Compensation Form ADV Part 2A.

Conversation Starter

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| <ul style="list-style-type: none">• How might your conflicts of interest affect me, and how will you address them? |
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How Do Your Financial Professionals Make Money?

Our Financial Professionals are compensated through asset based fees, salaries and bonuses. This means financial professionals have the incentive to increase the asset size in the relationship or solicit new business.

Item 4. Disciplinary History

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

No. You can visit www.investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starter

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| <ul style="list-style-type: none">• As a financial professional, do you have any disciplinary history? For what type of conduct? |
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Item 5. Additional Information

You can find additional information about our investment advisory services by visiting adviserinfo.sec.gov. You can request up to date information and a copy of the relationship summary by contacting us at ksap@saperstonlegacy.com or (716)649-9800 x 243.

Conversation Starter

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| <ul style="list-style-type: none">• Who is my primary contact person? Is he or she a representative of an investment adviser or broker dealer? Who can I talk to if I have concerns about how this person is treating me? |
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