Form ADV Part 2A - Firm Brochure
(Andrew Robinson, Trade Name Legacy Investment Advisors)

Legacy Investment Advisors (Trade Name of Andrew Robinson) 91-1367 Kaikohola St Ewa Beach, HI 96706

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Date of Brochure: February 9, 2026

This brochure provides information about the qualifications and business practices of Legacy Investment Advisors (a trade name of Andrew Robinson). If you have any questions about the contents of this brochure, please contact Andrew Robinson at (808) 699-5845 or via the website http://www.legacyinvestmentadvisor.com.

Additional information about Legacy Investment Advisors is available on the SEC's website at www.advisorinfo.sec.gov. Registration as an investment advisor does not imply a certain level of skill or training.

Item 2 – Material Changes

There are no material changes to this brochure since the last amendment (or initial filing).

Item 3 – Table of Contents

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Item 4 – Advisory Business

Legacy Investment Advisors, a trade name of Andrew Robinson (the "Advisor"), is a sole proprietorship registered as an investment advisor with the State of Hawaii. The Advisor provides discretionary investment advisory services to individuals and high-net-worth individuals.

The Advisor specializes in automated, active trading strategies using real-time market data, technical indicators, and AI-assisted computing. Strategies are executed through Interactive Brokers accounts with a minimum investment of $30,000. The Advisor acts as a fiduciary and provides personalized guidance while using systematic rules for buy/sell decisions (e.g., MACD crossovers, Relative Strength Indicator, volume filters, trailing profit targets). The goal is potential capital appreciation through compounding small wins and risk reduction (no intentional selling at a loss, focus on diversified large-cap stocks and commodities).

Services are tailored to client objectives, risk tolerance, and suitability (aggressive investors seeking higher potential returns). The Advisor does not offer wrap fee programs, financial planning as a separate service, or advice on non-securities investments.

Item 5 – Fees and Compensation

The Advisor charges an annual management fee based on assets under management (AUM), calculated monthly in arrears and billed directly to clients (invoice with payment due within 30 days).

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Fee Schedule:

- $30,000 – $500,000: 1.5% annually
- $500,001 – $1,000,000: 1.25% annually
- $1,000,001 – $5,000,000: 1.00% annually
- Over $5,000,000: 0.50% annually

Fees are prorated for partial months. Clients pay transaction costs (commissions) directly to Interactive Brokers. No upfront fees, performance fees, or other compensation is charged. Fees may be deducted automatically from client accounts if authorized (with client consent and safeguards), or paid by check/ACH/wire.

The Advisor receives no additional compensation from third parties.

Item 6 – Performance-Based Fees and Side-by-Side Management

The Advisor does not charge performance-based fees or participate in side-by-side management.

Item 7 – Types of Clients

The Advisor serves individuals and high-net-worth individuals with a minimum investment of $30,000. Clients must be suitable for an aggressive, active trading strategy with higher potential returns but significant risk of loss.

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

Methods of Analysis: Technical analysis using indicators (e.g., MACD, RSI, volume, ATR) on 1-minute charts, backtested and real-time data. Strategies are automated for signal generation and execution through Interactive Brokers.

Investment Strategies: Discretionary, active trading focused on momentum, mean-reversion, and volume surges in large-cap stocks and exchange-traded funds (ETF). Positions are held short-term; no intentional selling at a loss; diversification recommended (e.g., tech, healthcare, industrials, precious metals ETFs).

Risk of Loss: All investing involves risk of principal loss. Automated strategies may underperform in certain markets; past/backtested performance does not guarantee future results; slippage, commissions, taxes, and market gaps can reduce returns. Clients may lose more than invested in volatile conditions. The Advisor does not guarantee profits or protection from losses.

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Item 9 – Disciplinary Information

There is no disciplinary information to report.

Item 10 – Other Financial Industry Activities and Affiliations

None. The Advisor has no other financial industry activities or affiliations.

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

The Advisor has adopted a Code of Ethics requiring fiduciary duty, best execution, and fair allocation. Supervised persons (the Advisor) may trade for personal accounts consistent with client strategies but must avoid front-running or conflicts. Personal trades are monitored. Clients may request a copy of the Code of Ethics.

Item 12 – Brokerage Practices

Trades are executed through Interactive Brokers (selected for low costs, reliability, and automation compatibility). The Advisor does not receive soft dollars or additional compensation from brokers. Best execution is sought; block trades may be used with pro-rata allocation.

Item 13 – Review of Accounts

Accounts are reviewed regularly (at least quarterly) by Andrew Robinson for performance, suitability, and strategy adherence. Clients receive statements from Interactive Brokers.

Item 14 – Client Referrals and Other Compensation

No client referrals or other compensation arrangements exist.

Item 15 – Custody

The Advisor has limited custody only through fee deduction authority (with client consent and safeguards). No other custody applies.

Item 16 – Investment Discretion

The Advisor has discretionary authority to determine securities, amount, and timing of trades per client agreements.

Item 17 – Voting Client Securities

The Advisor does not vote client securities.

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Item 18 – Financial Information

Not applicable (no balance sheet required for state-registered RIAs without custody issues).

Item 19 – Requirements for State-Registered Advisors

As a state-registered advisor, the Advisor discloses that registration does not imply approval or endorsement by Hawaii or any other authority. No material legal or disciplinary events exist.

- **Education/Background:** Andrew Robinson, born 1984, Bachelor of Science in Economics (Brigham Young University, Provo, Utah), Master of Public Administration (State University at Albany, Albany NY)
- **Professional Background:**
    - 1/25-10/25 Administrative Services Officer (Dept. of Agriculture, Honolulu HI)
    - 10/25-2/26 Agricultural Loan Director (Dept. of Agriculture, Honolulu, HI)
    - 10/24-1/25 Financial Advisor (Northwestern Mutual, Honolulu, HI)
    - 6/16-12/24 President/CFO Robinson Family Farms LLC (Williamson NY)
    - 6/11-6/16 Budget Director / Assistant Finance Director (Town of Brighton NY)
    - 9/2007-6/2011 Budget Analyst (New York State Budget Division, Albany NY)
- **Other Business:** None.
- **Performance Fees:** None.
- **Disciplinary Events:** None.
- **Relationship with Issuers:** None.

This brochure is delivered to clients before or at the start of the advisory relationship and updated annually or upon material changes. Contact Andrew Robinson at 808-699-5945 with questions.