

ClientFirst Wealth Management
Form ADV Part 2A
Investment Adviser Brochure

February 2011

This brochure provides information about the qualifications and business practices of ClientFirst Wealth Management. If you have any questions about the contents of this brochure, please contact us at 501.603.0406 and/or ed@clientfirstwealthmanagement.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.

Additional information about ClientFirst Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2: Summary of Material Changes

Introduction

In July, 2010, the United State Securities and Exchange Commission published a new rule “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure is a new document prepared according to the SEC’s new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to ClientFirst Wealth Management’s (ClientFirst or the Firm) Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Full Brochure Available

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Edward Mahaffy at 501.603.0406 or ed@clientfirstwealthmanagement.com. Additional information about ClientFirst is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with ClientFirst who are registered, or are required to be registered, as investment adviser representatives of ClientFirst.

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Item 4: Advisory Business

Firm Description

ClientFirst is an investment adviser providing investment advisory services to individuals, financial institutions, retirement plans, corporations and trusts. ClientFirst was founded in 2002.

Principal Owners

ClientFirst is owned by its sole employee, Edward Mahaffy, President and Chief Compliance Officer.

Types of Advisory Services

ClientFirst offers the following types of advisory services: Financial planning services and portfolio management for individuals and/or small business.

Investment Advisory Services

ClientFirst provides **fee-only** discretionary investment advisory services, providing ongoing investment advice and monitoring of securities holdings based on the individual needs of the client.

ClientFirst develops portfolios based upon a client's goals, objectives, investment time horizon and risk tolerance, as well as their core financial-related values. ClientFirst uses asset allocation, or spreading investments among a number of asset classes and sectors (corporate bonds vs. government securities) for most client portfolios.

ClientFirst will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. Client portfolios include, but are not limited to, mutual funds, ETF's and Fixed Income securities. The mutual funds, if selected, 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; management style and philosophy; and fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances.

Financial planning may be offered as a component of the overall investment advisory services, and may include a review a client's current financial situation. A review may include the following components: cash management, risk management, insurance, education funding, goal setting, retirement planning, estate and charitable giving planning, tax planning, and capital needs planning. ClientFirst generally does not charge a separate fee for financial planning services.

Tailored Relationships

ClientFirst tailors investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in our client relationship management system. Client Questionnaires are created that reflect the stated goals and

objective. ClientFirst clients are allowed to impose restrictions on the investments in their account. ClientFirst may accept any reasonable limitation or restriction to discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to ClientFirst in writing.

Wrap Fee Programs

ClientFirst does not participate in a Wrap Fee Program.

Client Assets

As of December 31, 2010, ClientFirst manages approximately \$236 million in assets; all assets are managed on a discretionary basis.

Item 5: Fees and Compensation

Compensation

ClientFirst bases its fees on a percentage of assets under management, hourly charges, and fixed fees.

ClientFirst's fee schedules are described below.

Compensation – Investment Advisory Services

Fees for investment advisory services are billed as a percentage of assets under management as follows:

Comprehensive Wealth Management

<u>Client Account Balance</u>	<u>Annual Fee (%)</u>
Under \$500,000	Requires Approval
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.85
\$2,000,001 to \$3,000,000	0.75
\$3,000,001 to \$5,000,000	0.65
Over \$5,000,000	Negotiable

Fixed Income Management Only

<u>Client Account Balance</u>	<u>Annual Fee (%)</u>
Under \$500,000	Requires Approval
\$500,001 to \$1,000,000	0.75%
\$1,000,001 to \$2,000,000	0.65
\$2,000,001 to \$3,000,000	0.55
\$3,000,001 to \$5,000,000	0.45
Over \$5,000,000	Negotiable

Investment advisory fees are due and payable quarterly in arrears. Fees are generally calculated using the value of the client's portfolio on the last trading day of the quarter.

In certain circumstances, ClientFirst may charge hourly and/or project (fixed) fees, depending upon client needs. For example, ClientFirst may consult on the disposition of timber or timberland, or of a business, etc. Hourly and project-based fees are negotiable. Payment terms are also negotiable, but typically payment would be due on completion of the project.

Calculation and Payment

The specific manner in which fees are charged by ClientFirst is established in a client's investment advisory agreement with ClientFirst. ClientFirst will generally calculate fees

in arrears on a quarterly basis. Clients may elect to be invoiced directly for fees or authorize ClientFirst to directly debit fees from client accounts.

Accounts initiated or terminated during a calendar quarter may be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Agreement Terms

A client may terminate the client agreement at any time by notifying ClientFirst in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, ClientFirst will refund any unearned portion of the advance payment.

Other Fees and General Information on Compensation

ClientFirst's fees may be negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, fixed income holdings, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

Neither ClientFirst nor any of its supervised persons (employees) accept compensation (including commissions or 12b-1 fees) for the sale of securities or other investment products in client portfolios.

In addition to ClientFirst investment advisory fees, custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Mutual funds charge investment advisory fees and other fees which are described in each prospectus. ClientFirst is not compensated by mutual fund companies. Clients could generally avoid paying ClientFirst's investment advisory fees by purchasing mutual funds directly from the mutual fund companies.

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

Investment Advisory fees are calculated as described above and not on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client.

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

Neither ClientFirst nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

ClientFirst does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Types of Clients

As described in Item 4, ClientFirst's clients include individuals, financial institutions, retirement plans, corporations and trusts.

Account Minimums

ClientFirst requires a minimum account of \$500,000 for investment advisory services. Waivers or exceptions from the minimum may be granted at the exclusive discretion of Edward Mahaffy. ClientFirst may group certain related client accounts for the purposes of achieving the minimum account size.

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

Methods of Analysis

ClientFirst may employ several security analysis methods including charting; fundamental analysis; technical analysis; and cyclical analysis.

ClientFirst uses the following main sources of information: financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission (SEC), and company press releases.

Other sources of information that ClientFirst may use include information from investment managers, financial service companies, data base companies, financial journals, government sources, and the Internet.

Investment Strategies

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes a Client Questionnaire that documents their objectives and their desired investment strategy. Other strategies may include long-term and short-term purchases.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

ClientFirst reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. ClientFirst may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Initial Public Offerings

ClientFirst typically does not participate on behalf of its clients in initial public offerings.

Item 9: Disciplinary Information

Legal and Disciplinary

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

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

ClientFirst is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither ClientFirst nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Affiliations

Neither ClientFirst nor any of its management persons have a material relationship or arrangement with any related person or financial industry entities, including:

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships.

Other Investment Advisors

ClientFirst does not recommend or select other investment advisors for its clients.

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

Code of Ethics

ClientFirst employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Edward Mahaffy, President and Chief Compliance Officer, reviews all trades each quarter. These reviews ensure that personal trading does not affect the markets, and that clients of ClientFirst receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

As the sole employee, Edward Mahaffy maintains records on all personal trading.

Clients and prospective clients can obtain a copy of ClientFirst's Code of Ethics by contacting Edward Mahaffy at 501.603.0406.

Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross

ClientFirst and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

It is ClientFirst's policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. ClientFirst will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Participation or Interest in Client Transactions – Personal Securities Transactions

ClientFirst and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of ClientFirst will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of ClientFirst's clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and designed to reasonably prevent conflicts of interest ClientFirst and its clients.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

ClientFirst does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Directed Brokerage – Other Economic Benefits”.

Brokerage for Client Referrals

ClientFirst does not receive client referrals from broker/dealers.

Directed Brokerage

Clients may come to ClientFirst with an existing brokerage relationship and direct ClientFirst to execute their trades through that broker. This brokerage direction must be requested by the client in writing. Clients normally negotiate their commission rate directly with their broker. ClientFirst will not seek better execution services or prices from other brokers or dealers and as a result, client could pay higher commissions, other transaction costs, greater spreads, or receive less favorable net prices on transactions for the client's portfolio than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to its duty of best execution, ClientFirst may decline a client's request to direct brokerage if, in ClientFirst's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If a client does not have an existing relationship with a broker, ClientFirst may suggest the use of and request the client to authorize discretion on an account established through a variety of brokerage firms.

When ClientFirst recommends a broker, it has considered the broker's ability to offer best execution, including the costs of trades of listed securities, the costs of trades of securities in which other brokers may make a market, and the ability to execute trades as well as the full range and quality of the broker's services. ClientFirst periodically evaluates brokers/dealers or custodian based on a variety of factors, including, but not limited to, commission rates, the ability to negotiate commissions, execution capability, the financial condition of the broker/dealer, responsiveness, and the value and quality of custodial services provided to the client, if any.

In the case where a client has not directed his portfolio to a specific broker and ClientFirst has discretion to select the broker, ClientFirst negotiates brokerage fees on a case-by-case basis. Any negotiated discount is dependent upon the value of the services provided by the broker and transaction execution. ClientFirst does not adhere to any fixed guideline or formula. ClientFirst does not transact brokerage business based solely upon negotiated discount but also any discount negotiated is relative to the value of services provided. The clients of ClientFirst may pay commissions higher than those obtainable from other brokers as a result of this analysis.

ClientFirst's fundamental policy is to seek for its clients what, in its judgment, will be the best overall execution of purchase or sale orders and most favorable net prices in securities transactions consistent with its judgment as to the business qualifications of the various brokers with which ClientFirst may do business. Decisions with respect to the market in which the transaction is to be completed, the form of transaction, and the allocation of orders among brokers or dealers are made in accordance with this policy.

With respect to any brokerage commissions charged by executing brokers, for investment advisory portfolios, ClientFirst will continually review the commission charges to ensure they are reasonable within the current market place. The amount of commission paid for by each client for a transaction placed by ClientFirst may be higher than the cost if executed by an alternative broker/dealer. In such cases, ClientFirst will use its best efforts to determine that the higher commissions are reasonable in relation to the value of the brokerage and research services provided by the executing broker-dealer viewed in terms of either a particular transaction or ClientFirst' overall responsibilities to its other clients.

Directed Brokerage – Other Economic Benefits

ClientFirst may have the opportunity to receive traditional “non-cash benefits” from brokers such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk servicing a broker's advisers exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client portfolios; ability to have investment advisory fees deducted directly from client portfolios; access to an electronic communication network for client order entry and portfolio information; access to mutual funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors; reporting features; receipt of industry communications; and perhaps discounts on business-related products.

Brokers may also provide general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. ClientFirst has no written or verbal arrangements whereby it receives soft dollars. While ClientFirst endeavors at all times to put the interest of the clients first as part of its fiduciary duty, clients should be aware that the receipt of any additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Trade Aggregation

ClientFirst does not aggregate equity trades. Occasionally, ClientFirst will aggregate Fixed Income purchases, which are then allocated on an average cost basis. Accounts for the Firm or Employees will not be included in a block trade with client accounts.

Item 13: Review of Accounts

Reviews

Edward Mahaffy, President, typically prepares a five page Client Questionnaire to establish investment goals, objectives and management policies applicable to the client's investment portfolio. The Questionnaire generally covers the following areas: a review of the client's circumstances, the purpose of the portfolio and its time horizon, portfolio goals, tax considerations, investor goals, investment policy objectives, anticipated liquidity needs, investment philosophy and proposed asset allocation, investment selection, constraints, risk tolerance, monitoring intervals, and portfolio loans.

Edward Mahaffy continually supervises and monitors client accounts, and performs a more detailed review of client accounts periodically. These reviews typically include comparing the portfolio with the goals and objectives as outlined by the Client Questionnaire, reviewing changes to the client's investment circumstances, evaluating the specific holdings, re-balancing the portfolio and communicating the status of the portfolio to the client.

Clients are obligated to promptly notify ClientFirst of any changes in the client's financial status to ensure that investment strategies continue to meet the client's changing needs.

At the client's request, ClientFirst may review and/or update financial plans that are not implemented upon presentation. Such reviews and/or updates may be subject to ClientFirst's then current hourly rate.

Review Triggers

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, deposits, new investment information, and changes in a client's own situation.

Reporting

Clients receive monthly and/or quarterly statements from the custodian.

Item 14: Client Referrals and Other Compensation

Other Compensation

ClientFirst does not receive any formal economic benefits (other than normal compensation) from any firm or individual for providing investment advice.

Other Compensation – Brokerage Arrangements

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

Compensation – Client Referrals

ClientFirst does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Custody – Fee Debiting

ClientFirst has one form of custody. Clients may authorize ClientFirst (in the investment advisory agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). ClientFirst's investment assets will be held with a custodian agreed upon by the client and Client. The custodian is advised in writing of the limitation of ClientFirst's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to ClientFirst.

While ClientFirst will assist clients in establishing and maintaining accounts at the custodian, ClientFirst shall have no responsibility or liability with respect to custodial arrangements or the acts, omissions or other conduct of the custodian.

Custody – Account Statements

As described in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that ClientFirst provides. ClientFirst statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities

Item 16: Investment Discretion

Discretionary Authority for Trading and Limited Power of Attorney

Through the investment management agreement, ClientFirst may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows ClientFirst to execute trades on behalf of clients.

When such limited powers exist between the ClientFirst and the client, ClientFirst has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, ClientFirst may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to ClientFirst in writing.

However, ClientFirst consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Item 17: Voting Client Securities

Proxy Voting

ClientFirst does not have any authority to and does not vote proxies on behalf of clients. ClientFirst also does not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation. Clients retain the responsibility for receiving and voting proxies and any legal proceedings for securities maintained in their portfolios; clients receive these corporate actions from directly from either custodians or transfer agents.

If requested, ClientFirst may provide advice to clients regarding proxy votes and legal proceedings. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Edward Mahaffy at 501.603.0406 for information about proxy voting.

Item 18: Financial Information

Financial Condition

ClientFirst 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.

ClientFirst is not required to provide a balance sheet; ClientFirst does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Other Information

Privacy

ClientFirst is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver our Privacy Notice to you annually, in writing.

Business Continuity Plan

ClientFirst has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people. The Business Continuity Plan covers natural and man-made disasters. Electronic files are backed up daily and archived offsite.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. ClientFirst's intention is to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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ClientFirst Wealth Management
Form ADV Part 2B
Investment Adviser Brochure Supplement

Supervisor and Supervised Person: Edward P. Mahaffy

February 2011

This brochure supplement provides information about the Firm's Supervised Persons that supplements the ClientFirst Wealth Management's brochure. You should have received a copy of that brochure. Please contact Edward Mahaffy if you did not receive ClientFirst Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov.

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www.clientfirstwealthmanagement.com

Educational Background and Business Experience

Education and Business Background

ClientFirst requires a college degree and/or industry experience. Investment adviser representatives must be properly licensed and registered in all jurisdictions required.

Professional Certifications

Edward Mahaffy maintains professional designations, which requires the following minimum requirements:

ChFC - Chartered Financial Consultant

Issued by: The American College

Prerequisites/Experience Required: Candidate must meet the following requirements:

- 3 years of full-time business experience within the five years preceding the awarding of the designation

Educational Requirements: 6 core and 2 elective courses

Examination Type: Final proctored exam for each course

Continuing Education/Experience Requirements: 30 CE credits every 2 years

CFP - Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

Supervised Persons

Edward P. Mahaffy

Born 1959

ClientFirst Wealth Management
President / Portfolio Manager/Chief Compliance Officer

2002 - Present

Raymond James Financial Services, Inc.
Financial Adviser/Registered Principal/Portfolio Manager

2001 - 2007

Merrill Lynch
Vice President
Financial Adviser / Portfolio Manager

1995 - 2001

Stephens Inc.
Financial Adviser / Portfolio Manager

1984 - 1995

Education:

Masters in Business Administration, University of Arkansas
Bachelor of Science in Business Administration, The Citadel

Professional Designations:

Certified Financial Planner (CFP®)
Chartered Financial Consultant (ChFC®)
Member of National Association of Personal Financial Advisors (NAPFA)
Member of Financial Planning Association (FPA)

Disciplinary Information

Disciplinary Information

Neither ClientFirst nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

Other Business Activities

Other Business Activities

As disclosed in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations, Edward Mahaffy is not actively engaged in any outside business activities.

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither ClientFirst nor Edward Mahaffy receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

Supervision

Supervision

Edward Mahaffy is the sole employee named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Edward Mahaffy may be reached at 501.603.0406.