



## **FORM ADV PART 2A FIRM BROCHURE**

**First Allied Asset Management, Inc.  
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This brochure provides information about the qualifications and business practices of First Allied Asset Management, Inc. If you have any questions about the contents of this brochure, please contact First Allied Asset Management's Compliance department at (800)223-0989. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

First Allied Asset Management, Inc. is a registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training.

Additional information about First Allied Asset Management, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2- Material Changes

The following items explain material changes that you should be aware of as a current or prospective client of our advisory programs or services. Each year you will receive either a summary of material changes that were made to the brochure over the previous year or an updated brochure. You can always request a full copy of any of our current disclosure brochures by calling 800-223-0989.

The changes that have been made to this document since our annual amendment in March 2011 are summarized below:

- ***Management Change***

On May 31, 2012, Robert Holcomb announced his resignation as President of First Allied Asset Management. Mr. Holcomb will continue in his role as Chief Marketing Officer for First Allied Holdings, Inc. and continue to be involved in all First Allied companies. Mr. Holcomb is responsible for overseeing the revenue generating and business development functions at First Allied including marketing/communications, recruiting, and fee-based technology platforms. Craig Columbus, previously First Allied Asst Management's Chief Market Strategist, has assumed the role of President; Jeff Mindlin, previously the Chief Operating Officer, has assumed the role of Senior Managing Director/Chief Portfolio Strategist. Lon Gerber has assumed the role of Chief Operating Officer.

- ***Consolidation Announcement***

First Allied Securities, Inc., an affiliated registered investment adviser and broker-dealer, will be transferring its investment advisory business to another affiliate of ours, First Allied Advisory Services, Inc., on June 30, 2012. Both firms are wholly owned subsidiaries under the ultimate ownership of First Allied Holdings. Clients that are affected by this consolidation will receive notice of this transfer on or around April 30, 2012, sixty (60) days prior to the consolidation date. Clients that are affected by this consolidation will receive notice regarding how they are impacted and what their options are. After the consolidation, First Allied Securities will continue its business as a registered broker/dealer and remain a wholly-owned subsidiary of First Allied Holdings and affiliated with both First Allied Asset Management and First Allied Advisory Services.

- ***Additional Subadviser Relationship***

Beginning in March 2012, First Allied Asset Management began providing advisory services to The Multi-Strategy Growth & Income Fund ("MGIF"). MGIF is a non-diversified, closed end mutual fund whose investment objective is to seek returns from capital appreciation and income with an emphasis on income generation. First Allied Asset Management is a subadviser to MGIF and is only responsible for managing the common stock portion of the fund, which is expected to be approximately 20% of the fund's assets. The sponsor of the fund is RJL Capital Management, LLC. MGIF became publicly available on March 15, 2012.

- ***Management Change***

In January 2012, Frank Campanale, a senior member of the management team at First Allied Securities, Inc. and affiliate First Allied Asset Management, Inc., announced his resignation from the management team. Mr. Campanale continued advising First Allied on the development of fee-based programs until he resigned from First Allied in April 2012.

- ***Ownership Change***

On November 1, 2011, First Allied Asset Management, Inc. was acquired by First Allied Holdings, Inc. ("Holdings"). Holdings is controlled by Lovell Minnick Partners, LLC, an independent private equity firm providing equity capital for leveraged buyouts and private company recapitalizations and growth capital for developing companies. In the same transaction, Holdings also acquired affiliates First Allied Advisory Services, Inc., First Allied Securities, Inc. and First Allied Wealth Management, which itself owns First Allied Retirement Services, Inc. and FASI Insurance Services, Inc. While the ultimate ownership has changed for each of these firms, the management structure for each of these firms remains the same.

- ***Name Change***

On September 15, 2011, Advanced Equities Asset Management filed a Certificate of Amendment with the Delaware Department of Corporations, changing its name to First Allied Asset Management.

- ***New Advisory Programs***

First Allied Securities, Inc. and First Allied Advisory Services, Inc. have created new advisory programs for which we serve as the portfolio manager. Though our investment methodology for these programs falls in line with what we have offered previously, these new programs have different features. For more information about all First Allied Securities' and First Allied Advisory Services' advisory programs, please see their disclosure brochures, which are available through your financial advisor.



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## Item 4- Advisory Business

### *Background*

First Allied Asset Management, Inc. ("FAAM") is an investment adviser registered with the Securities and Exchange Commission ("SEC"). Being registered does not mean that FAAM is endorsed by any regulatory authority; it simply means that FAAM is required to follow the rules established by the SEC. Representatives of FAAM are registered in every state where the representatives may discuss portfolio management with clients of investment advisers who hire FAAM. Throughout the remainder of this text, "we," "us," and "our" refers to FAAM.

FAAM was founded in 2006. On November 1, 2011, First Allied Holdings, Inc. ("Holdings") purchased FAAM from Advanced Equities Financial Corp. ("AEFC"), who had owned FAAM since 2007. In the same transaction, Holdings acquired several affiliated companies that offer financial products and services (see Item 10- Other Financial Industry Activities and Affiliations on page 10 for more information). Holdings is controlled by Lovell Minnick Partners, LLC ("Lovell Minnick"), an independent private equity firm providing equity capital for leveraged buyouts and private company recapitalizations and growth capital for developing companies.

Our portfolio management and trading activities are based in Scottsdale, although some of these responsibilities and other firm operations may be conducted by employees located in San Diego, CA, Chesterfield, MO, or Castle Rock, CO.

### *Our Principal Officers*

Craig Columbus serves as President of FAAM, setting the firm's strategic direction and management priorities. Mr. Columbus formerly served as the Chief Market Strategist for FAAM and for Thomson Financial. During this time, he became one of Wall Street's most recognizable figures, appearing each Monday on CNBC's *Power Lunch* program for seven years. Mr. Columbus also previously served as the Chair and Executive Director at the Center of Entrepreneurship and Innovation at Grove City College in Pennsylvania.

Jeff Mindlin is FAAM's Sr. Managing Director and Chief Portfolio Strategist. In this capacity, Mr. Mindlin is responsible for the portfolio management team and its efforts, including portfolio selection, proprietary money management and product development. Prior to joining FAAM, Mr. Mindlin was the Director of Research and Co-Portfolio Manager of Greenbook Investment Management, Inc.

Lon Gerber is FAAM's Chief Operating Officer, managing day-to-day operations. In this capacity, Mr. Gerber is mainly responsible for the trading operations for all FAAM-managed strategies. Prior to joining FAAM, Mr. Gerber spent over 10 years at Thomson Financial, a leading provider of information and technology solutions to the worldwide financial community.

Luanne Borowski has been the Chief Compliance Officer of First Allied Asset Management and First Allied Securities, Inc. since February 2007. Since July 2010, Ms. Borowski has also been the Chief Compliance Officer of First Allied Advisory Services. Ms. Borowski previously served as Chief Compliance Officer of Asset Planning Solutions, a broker/dealer, and Ken Stern & Associates, a registered investment adviser, from August 2000 until January 2002.

Janice Doza became the Chief Financial Officer of First Allied Asset Management in March 2011. Ms. Doza also currently serves as the Chief Financial Officer of First Allied Advisory Services and First Allied Securities. Ms. Doza previously served as Chief Financial Officer and Controller for FFP Securities, Inc. until 2008. From April 2003 through March 2006 Ms. Doza served as Controller for First Financial Planners, Inc.

### *Our Portfolio Management Team*

Craig Columbus serves as President of FAAM. Mr. Columbus formerly served as the Chief Market Strategist for FAAM and for Thomson Financial. He is currently a regular guest on a variety of CNBC shows, including *Kudlow & Company* and *Power Lunch*, among others.

Jeffrey Mindlin serves as FAAM's Sr. Managing Director and Chief Portfolio Strategist, managing day-to-day operations. In this capacity, Mr. Mindlin is responsible for the portfolio management team and its efforts, including portfolio selection, trading, execution, proprietary money management and product development. Prior to joining FAAM, Mr. Mindlin was the Director of Research and Co-Portfolio Manager of Greenbook Investment Management, Inc., where he was instrumental in the design of sophisticated, proprietary investment strategies. Before that, he worked as the Assistant Portfolio Manager and Senior Financial Engineer for Pinnacle Investment Advisors, LLC, which operated a hedge fund and a series of managed accounts for institutional and high-net-worth clients, and sub-advised a publicly traded mutual fund. Previously, Mr. Mindlin was the Manager of Financial Engineering at Camelback Research, leading the development of several successful institutional grade quantitative products, including the popular MSN Money StockScouter system.

Thomas Samuelson, CFA, CMT serves as the Chief Investment Officer for FAAM. Previously, Mr. Samuelson served as the Portfolio Manager at Geronimo Partners where he oversaw a family of three hedge funds. He was also the Portfolio Manager at Invesco Funds Group for a diversified long/short fund and a sector energy fund, where he improved the energy fund's Lipper peer group ranking from bottom-quartile to upper-quartile while its assets grew to over \$330 million. Previously, he also served as the President and



Portfolio Manager for Denver Energy Advisors, where he managed separate accounts for large institutional clients such as the Notre Dame endowment. Mr. Samuelson received his derivatives experience from Swiss Bank Corp (previously O'Connor & Associates), where he managed proprietary funds for the Bank. He began his career as a high yield bond analyst for Duff & Phelps in Chicago and later became a partner of the firm.

Lon Gerber serves as Chief Operating Officer for First Allied Asset Management. Prior to joining FAAM, Mr. Gerber spent over 10 years at Thomson Financial, a leading provider of information and technology solutions to the worldwide financial community. In this capacity, he was responsible for directing analytic product development for the Wealth Management division. During his time at Thomson, Mr. Gerber was highly regarded for his expertise in the area of insider trading analysis and regularly appeared in the financial media, including *The Wall Street Journal*, *Barrons* and *Forbes*, amongst many others. Mr. Gerber began his career in the banking industry as a financial analyst for Citibank, responsible for revenue forecasting for its U.S. consumer and commercial lending products.

Brian Wright serves as the Senior Portfolio Manager for First Allied Asset Management. Mr. Wright has over a decade of industry experience. Previously, he served as Trader with Pinnacle Investment Advisors, where he helped oversee a family of hedge funds, institutional separate accounts, and a publicly traded mutual fund. Mr. Wright was also an Analyst with a boutique research firm, where he focused on forensic accounting and earnings quality-related research. He was one of the first analysts to raise questions about the accounting practices and viability of Krispy Kreme as early as 2003.

Eitan Boral serves as Assistant Portfolio Manager for First Allied Asset Management. Previously, Mr. Boral was an Account Manager with Logical Information Machines ("LIM"), where he worked with traders and analysts at large financial institutions and hedge funds to implement trading strategies using LIM's market research tools.

Collin Martin serves as Investment Consultant for First Allied Asset Management. Prior to joining First Allied Asset Management, Mr. Martin worked at First Allied Securities where he was a Quality Assurance Specialist providing operational analysis and developing profitability models. Mr. Martin graduated cum laude from the Max M. Fisher College of Business at The Ohio State University and is currently a Level 3 candidate in the CFA Program.

For more information about our portfolio management team, please refer to the Form ADV Part 2B Brochure Supplements at the end of this brochure.

#### *Our Advisory Activities*

We are primarily engaged in the business of providing portfolio management services. We are generally hired to manage accounts in programs created by other investment advisers, including affiliated investment advisers. We also provide management services to a sponsor of a closed-end mutual fund, The Multi-Strategy Growth & Income Fund ("MGIF").

We do not maintain custody of your accounts. The firms that hire us to provide portfolio management services on their behalf enter into relationships with qualified custodians. The majority of the accounts that select our strategies result from our relationships with our affiliates, First Allied Securities, Inc. ("First Allied") and First Allied Advisory Services, Inc. ("FAAS"). Both First Allied and FAAS are registered investment advisers. First Allied is also a registered broker/dealer and FINRA member. The majority of First Allied and FAAS' advisory accounts are introduced to custodians through First Allied's broker/dealer. Pershing, LLC ("Pershing"), J.P. Morgan Clearing Corp ("JP Morgan"), and Fidelity Investments ("Fidelity") are generally chosen as custodians by the firms that hire us.

We communicate with you primarily through your investment adviser representative ("IAR") that is registered with the investment adviser sponsoring the program. We rely on that IAR to analyze your goals and needs when recommending a strategy that we manage. The IAR will collect suitability information and ensure that the investment strategy chosen is appropriate for the client.

We use stocks, bonds, mutual funds, options, exchange-traded funds ("ETFs"), closed-end funds ("CEFs"), and American Depositary Receipts ("ADRs") in the accounts we are hired to manage. Sometimes we are hired to manage variable insurance products.

If you wish to maintain a previously owned security, or not invest in a certain security, we may be able to work with your IAR to place this restriction on your account. The majority of our management is through pre-defined strategies, but certain programs can be customized to meet unique requests. More information about our pre-defined strategies can be found in Item 8- Methods of Investment Analysis, Investment Strategies and Risk of Loss, starting on page 7.

In addition to portfolio management services, we also provide advice on model creation, recommend asset allocations, and provide educational support for our clients. These services generally part of the overall client relationship and we do not generally charge separately for them. Occasionally we may be hired to consult for another firm. Consultations are limited to providing advice on portfolio analysis and recommendations.

We calculate the amount of assets that we manage every year. As of December 31, 2011, we managed:

- \$611,760,361 in discretionary assets
- \$79,628,076 in non-discretionary assets



Discretionary assets are the assets with which we have the authority to determine whether to buy or sell securities. This authority is called a trading authorization and is described in more detail in Item 16- Investment Discretion on page 12. Non-discretionary assets are assets in accounts that we provide recommendations on, as to the purchase or sale of specific securities, but another investment adviser makes the final investment decisions.

## Item 5- Fees and Compensation

### *Overview*

For the majority of our services, we are compensated for our management services with a portion of the advisory fee you pay to the firm that you entered into a management agreement with, otherwise known as the “sponsor.” The amount of the fee paid to us will depend on several different factors. For our services in relation to MGIF, we are compensated directly from the sponsor of the fund, RJL Capital Management, LLC, and not from the clients of the fund. MGIF’s fee and expense information can be found in the fund’s prospectus.

The advisory fee you are charged is outlined in your advisory agreement. This fee is calculated and deducted from your account by the sponsor of the program. A portion of the fee, the ‘management fee,’ is paid to your IAR. Another portion of the fee, the ‘program fee’ is paid to the sponsor of the program. We are paid from the program fee, based on the amount of assets invested in the strategies we offer. Our portion of the program fee is designated in the subadvisory agreement between us and the program sponsor.

Just as you enter into an agreement with your IAR and/or the program sponsor, we enter into an agreement to manage accounts for a firm. This agreement is called a “subadvisory agreement.” The subadvisory agreement outlines the responsibilities of the various parties to the contract and details the breakdown of the fees paid to each party. The fees we charge for our management services vary. It is possible that your IAR’s firm will pay more or less than the other firms to which we provide management services. This may result in you paying a higher fee to us than other clients for the same services.

### *Other Fees*

Unless otherwise stated, transactions are effected net of, meaning without, commissions. However, either you or your IAR may designate certain holdings as not eligible to be included in the calculation of the advisory fee. For example, assets that you recently paid a commission on may be exempt from the advisory fee.

Depending on the account custodian, you may be charged for the purchase or sale of a security. In addition, each custodian may charge additional transaction fees depending on the type of security purchased or sold. Electronic funds and wire transfer fees, transfer taxes, account maintenance fees, margin fees, transaction charges, exchange fees, and odd lot differentials are examples of fees that may be charged by the custodian. These fees are charged by the custodian and are not included in the advisory fee that you pay. We do not determine these charges nor receive any portion of them, although our affiliated broker/dealer, First Allied, may receive a portion of these charges for accounts that use First Allied as the broker/dealer of record. Mutual funds often charge investors additional advisory or management fees. A portion of these may be passed on to the broker/dealer of your account as mutual fund trailers or for marketing purposes. We do not directly receive any portion of these fees. An account service schedule detailing all these fees will be provided to you upon account opening.

Based on the activity in your account, you may pay more or less for a managed account than if you had a brokerage account or an account with a mutual fund company. Your IAR should be able to discuss with you the characteristics of opening a managed account.

### *Verification of Fees*

You are always responsible for verifying that the fee you are charged is accurate. The custodian will not determine whether the fee is properly calculated. Should you find an error, please contact your IAR immediately.

### *Conflicts of Interest*

We offer our services to several firms; some are affiliated with us, others are owned by registered representatives of First Allied, and others are owned by unaffiliated parties. Some of the firms that hire us may offer similar services under different program names. Our relationships with the various firms that we provide management services to may allow us to enter into agreements with fund companies or product sponsors, such as mutual fund companies, to receive discounted fees. These savings will not affect your total advisory fee, but may provide us with an incentive to work with fund companies or product sponsors that provide such discounts to us.

It’s important to remember that we are receiving a portion of your advisory fee for our services. This may impact the total advisory fee you pay. Some sponsor firms may offer the strategies we manage for different fees than other firms. It is up to the sponsor firm to determine the charge to clients. You may be able to receive services similar to those that we offer for different rates.

Certain of our IARs and employees have an ownership interest in Holdings, which presents a conflict of interest with respect to the services they provide to certain strategies in that certain actions may be more profitable to Holdings and its subsidiaries than other actions. As owners of Holdings, these individuals have an interest in its highest profitability. We help mitigate this conflict by requiring that all IARs and employees abide by our Code of Ethics, which is described more fully in the Code of Ethics section of this Item, starting on page 10.



## Item 6- Performance-Based Fees

Performance-based fees are fees where the firm shares in a percentage of an account's capital gains and appreciation. We do not charge or receive any portion of performance-based fees.

## Item 7- Types of Clients

FAAM provides services to other investment advisers. We do not contract directly with individual investors. Instead, we are hired by other firms to provide management services to their clients. Our strategies are mostly used as a foundation for another investment adviser's advisory programs. However, we also provide investment management services to a sponsor of a closed-end mutual fund, MGIF. We mainly provide services to two registered investment advisers that are affiliated with us:

- First Allied Securities, Inc.
- First Allied Advisory Services, Inc.

More information about these two affiliated investment advisers is provided in Item 10- Other Financial Industry Activities and Affiliations on page 10.

We also provide services to investment advisers owned by individuals affiliated with First Allied's broker/dealer and investment advisers owned by unaffiliated entities. Minimum investment amounts are established by the firm that has contracted with us to provide services.

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

### *Types of Risk*

Various types of risk are involved when investing in securities. Economic risk, market risk, currency risk, inflation risk, liquidity risk, and credit risk are examples of the types of risks your account may be subject to. If you are invested in one of our strategies, there is also the risk that your account value will decrease because of the investment decisions that we make. It is possible that our investment decisions will cause our strategies to underperform other investment strategies or the markets as a whole.

### *Assessing Risk*

While some types of risk can be mitigated by investment strategies, many of these risks cannot be eliminated completely. Your IAR will work with you to make sure that you are comfortable with the risks associated with the type of investments that are in your account. It is important to make sure that you understand these risks.

For accounts investing in structured products or options, you will be provided additional disclosures by your IAR that explain the unique risks of these complex products.

### *Risk of Loss*

You should know that all types of securities investing involve risk. Your account value can both increase and decrease over time. You should not invest in any product if you are not prepared to bear a potential loss. Past performance does not guarantee future results.

### *Management Style*

Our management style is based on our attitude toward risk management. We aim for low risk. We seek to protect our client's investment and help it grow more effectively. Our goal is to lose less in a 'down' market but this typically means we will not gain as much in an 'up' market. We believe that markets change over time. We actively research market movement and adjust our strategies accordingly. Active management is not about being invested or not. It is about playing offense and defense by selectively overweighting or underweighting certain asset classes. Our diverse strategies give you access to invest in a variety of asset classes. This approach allows us to change our weightings across industries as we see fit.

Our research process starts broadly. We use a combination of mathematical analysis and in-depth research to identify investment ideas. We have sophisticated tools that help us measure how our models compare with our outlook for the market.

### *Methods of Analysis*

Our method of analysis stems from our philosophies of risk management and an active approach that is guided by the multi-disciplinarian portfolio management team. Our portfolio managers have diverse backgrounds with highly specialized expertise in quantitative modeling, global macro analysis, politics, technical analysis, derivatives, and forensic accounting. Our method of analysis thus draws from these tools, but may vary based on the specific strategy and objective. For broader asset allocation strategies, we primarily take a top-down view of the world to determine areas to invest and areas to avoid. This analysis includes:

- Technical assessment of price, seasonality, and relative relationships
  - One risk inherent in technical analysis is that it relies on historical data to make predictions of future price movements which may not always follow historical patterns
- Fundamental and valuation analysis of historic and relative value and growth

- Risks inherent in using this type of analysis include overlooking what is happening to the larger domestic or global economic environment when analyzing a particular security or industry
- Economic factors that might contribute to movement of the asset class
  - Risks inherent in using this type of analysis include unforeseen price fluctuations of individual securities or industries that are not related to the overall domestic or global economic environment

For stock selection strategies, we typically start with a forensic accounting filter used to identify potential accounting red flags. We then analyze the financial statements and other publicly available information to evaluate the firm relative to its peers. Technical analysis may be used to determine entry triggers, or good times to purchase the security. Our macro analysis can lead to sector or style over-investment (in relation to our strategy's optimal allocation) as well as relative risk targets.

For all of our strategies, we rely on our internal analysis as well as investment research that is provided by unrelated parties.

## *Investment Strategies*

We have developed the following strategies for the firms that hire us as a manager:

### **Mutual Fund Select (formerly known as "Fund Allocator")**

Mutual Fund Select ("MF Select") is a managed mutual fund strategy that utilizes custom market models from us to produce asset allocations to facilitate construction and management of your portfolio. MF Select relies on dynamic management to combat market volatility, and utilizes mutual funds within each asset class screened and ranked by us. MF Select is designed to provide you with long-term, risk-adjusted returns. The mutual funds in MF Select represent 13 different asset classes and you have the option of choosing between 10 different asset allocation models (including 5 tax-sensitive models). Occasionally, we will utilize other securities, such as exchange-traded funds ("ETFs"), in the MF Select program in order to provide exposure to an investment theme more efficiently, among other reasons.

### **One Account Select ("OAS")**

OAS is a unified managed account strategy that utilizes custom market models from us to produce an asset allocation that facilitates the construction and management of your portfolio. A unified managed account strategy is a highly sophisticated strategy that combines multiple investment vehicles into a single portfolio and account, maximizing efforts to enhance diversification. A unified managed account generally allows multiple portfolio managers to manage a portion of your total account. Envestnet acts as the overlay manager for the OAS strategy. An overlay manager is responsible for coordinating trading activities in your account among all of the portfolio managers.

The OAS strategy is comprised of exchange-traded funds, mutual funds, and separate accounts managed by third-party managers. These securities represent 14 different asset classes and you have the option of choosing between 8 different asset allocation models (including 4 tax-sensitive models). The program and management fees for OAS differ depending on the specific model selected.

### **ETF Select**

ETF Select is designed as a comprehensive asset allocation strategy giving clients exposure to an actively managed blend of stocks, bonds, and alternative assets. ETFs are used to obtain asset class exposures. ETFs offer many advantages over mutual funds including precision, tax efficiency, liquidity, and lower expenses. In the ETF Select strategy, assets are strategically allocated across a wide range of asset classes, utilizing primarily ETFs, through a comprehensive investment process. There are five models available for ETF Select, ranging from the Conservative portfolio, which has an allocation of 20% equities and 80% fixed income, to the Aggressive Growth portfolio that is allocated to almost 100% equities.

### **Yield Select**

The Yield Select strategy invests in highly liquid U.S.-listed securities, including equities, American Depositary Receipts ("ADRs"), and closed-end funds ("CEFs"). Its primary objective is to offer a balance between current income and future growth, with a bias toward risk management. The portfolio will be comprised of two parts: the first invests in CEFs representing both equity and fixed income asset classes and the second invests in individual stocks that have a high current dividend yield plus the potential for dividend growth. Between the two pieces, the goal is to establish a portfolio of approximately 40 positions that is diversified by asset class, sector and size that will generate current income through dividends, interest income and royalty payments plus offer the potential for long-term appreciation.

### **U.S. Large Cap Select ("USLCS")**

USLCS is a separately managed account strategy investing in highly liquid U.S.-listed equities. We manage this strategy for investors seeking a risk-managed approach that strives to build and maintain wealth. USLCS seeks to outperform the S&P 500 index with a bias toward downside risk management. The strategy is designed to accommodate growing concern about market risk while still providing the participation in growth that is available through equity investing. In USLCS accounts, we employ a disciplined methodology to identify opportunities to purchase stocks in large U.S. companies that the portfolio management team believes are poised for enhanced performance with a favorable risk/reward tradeoff.

### **401(k) Select**

The 401k Select strategy is divided into two distinct types of services: Single Asset Class Fund ("SACF") selection and portfolio





management of a company-sponsored 401(k) plan account (Professionally Managed Portfolio (“PMP”)). The retirement plan’s trustee works with us to establish the SACF selection for his company’s retirement plan. By working with us to establish a list of mutual funds available to his plan’s participants, the trustee is allowing plan participants to create their own portfolios.

Plan participants also have the option of choosing the PMP option. By choosing the PMP option, participants are opting to have their company-sponsored retirement plan account managed by us. The PMP option allows plan participants to choose from five different asset allocation models (portfolios): Conservative, Conservative Growth, Moderate Growth, Growth, and Aggressive Growth. Each of these models is actively managed by us. Our management style for each asset allocation model provides broad diversification across most major asset classes through the purchase of a basket of selected mutual funds. The portfolios include a consistent allocation to stocks, bonds, and alternative assets. A description of each of the asset allocation models can be found in the 401(k) Select disclosure brochure.

#### **Private Client Services (“PCS”)**

We created the PCS strategy to provide higher net worth clients the opportunity to have some, or all, of their assets managed in one place. PCS is open to clients that will have at least \$500,000 invested in the strategy. Your IAR will work with you and us to determine the most efficient allocations of your current accounts. The PCS strategy includes a combination of the ETF Select, U.S. Large Cap Select, and Yield Select strategies described above used in combination with some customized options that we can develop for you. These customized options may include:

- A laddered municipal bond portfolio designed to meet your specific investment time horizon. We will purchase multiple municipal bonds with staggered maturity dates in an attempt to diversify interest rate risk while providing regular cash flow.
- A structured products portfolio to provide limited downside protection and extra participation on the upside. Structured products come in many forms, but are typically short term investments (typically 18 to 36 months) that resemble bonds, but are issued by a bank and track an index. They do not pay interest like bonds, but instead pay a return at maturity if the index it is tracking increases, or returns a discounted amount of principal if the index is down over the time period.
- A covered call, or options, portfolio consisting of a bucket of individual covered call positions. A covered call involves the simultaneous purchase of a stock and sell of a call option, which means that someone can buy your stock at a specific price (“strike price”) when they choose to. It provides some protection against loss in exchange for participation in gains, as limited by the call’s strike price. Positions are diversified by sector, strike price, and expiration date. We try to select stocks that have attractive covered call opportunities.
- An options portfolio based on your current holdings that may have a low cost-basis or consist of a large percent of your holdings, such as company stock. We use options strategies to help provide cash flow from these low-basis positions. We can also help create option strategies that provide a systematic exit plan from highly concentrated positions. We may employ more complicated option techniques for these strategies. These techniques may involve the simultaneous purchase and sale of options at different expiration months and strike prices.

#### **Risk Managed Growth**

The Risk Managed Growth strategy is designed to achieve a long term target allocation of approximately 100% stocks and hard assets (commodities, real estate investment trusts), and is intended for investors with an investment horizon of greater than 15 years. The objective is to offer clients equity-like returns with lower volatility. The strategy typically invests in a basket of individual stocks and ETFs, providing global exposure to a variety of equity, fixed income, and alternative asset classes. Because domestic large cap is the most significant portion of the portfolio, we utilize an active stock selection strategy to fulfill this asset class instead of simply using index funds. A basket of large-cap, individual equities is selected based on a rigorous, systematic screening process. To round out the portfolio, a combination of ETFs and mutual funds are used to gain exposure to small-cap, international, and alternative asset classes. We systematically adjust some portion of the total holdings to reflect changes in its investment outlook.

#### **Covered Call**

The Covered Call strategy includes 12 to 17 individual covered call positions, each of which includes the simultaneous purchase of an underlying stock and the sale of a call option. The strategy provides limited downside protection in exchange for capped upside participation. The strategy uses call options to attempt to provide some downside buffer and reduce equity correlation. Positions are diversified by sector, strike price, and expiration. Stocks are systematically selected through rigorous fundamental and technical screens and must provide attractive covered call return opportunities. The strategy was developed to offer additional sources of income as well as provide an added cushion in the event of a market downturn. As such, the strategy may achieve these objectives while not necessarily outperforming a particular benchmark. MFGI utilizes the Covered Call strategy.

#### **All Strategies**

Certain of the strategies that we manage are offered under different names through different firms, but the underlying strategies are the same. Not all firms that hire us as portfolio manager offer all of the strategies listed above. Some firms may require that IARs engage in additional training prior to offering access to certain strategies.



## Item 9- Disciplinary Information

FAAM has not been the subject of any disciplinary actions by any regulator or other authority. However, some of our affiliated investment advisers have been the subject of various regulatory and disciplinary findings by various states and regulatory bodies. Please see our affiliates' disclosure document(s) for information relating to these events.

## Item 10- Other Financial Industry Activities and Affiliations

### *Related Financial Industry Entities*

We are also affiliated with other registered investment advisers. Our parent company, Holdings, owns two other investment advisers:

- First Allied Advisory Services ("FAAS")
- First Allied Securities, Inc. ("First Allied")

First Allied is a dual registrant. This means that First Allied is both an investment adviser and a broker/dealer. We work closely with both First Allied and FAAS. We are the subadviser for several programs sponsored by First Allied and FAAS.

In addition to the firms listed above, Holdings also owns First Allied Retirement Services, Inc. ("FARS"). FARS is a pension administration firm that provides pension services to pension plan sponsors. Neither FAAM nor our IARs receive any compensation for referring clients to FARS. Greenbook Pension Services is another name under which FARS operates. FARS owns Associates in Excellence, which is another pension administration firm that provides pension services to pension plan sponsors.

Holdings also owns FASI Insurance Services, Inc. ("FAIS"). FAIS is an insurance general agency that offers insurance products through licensed agents. Many agents offering insurance through FAIS are also First Allied registered representatives.

Our principals, employees and representatives may have responsibilities to any of these listed affiliates. Certain administrative and payroll expenses for employees of any affiliate may be allocated among all of the affiliates. Allocation of these expenses is not determined by assets referred to any affiliate.

Certain affiliates and their personnel may buy and sell securities for their own accounts. In some cases, these affiliates and their personnel may buy and sell the same securities which may be purchased or sold as part of one or more of our investment strategies. Our Code of Ethics governs our personnel's trading activity and is explained more fully in the next Item. We do not buy or sell any securities for our own firm account.

### *Other Financial Industry Activities*

In addition to the related entities noted above, we also conduct business with other RIAs that are owned or operated by registered representatives of our affiliated broker/dealer, First Allied and other, non-related parties.

## Item 11- Code of Ethics

### *Overview*

Pursuant to SEC rule 204A-1, we have adopted a Code of Ethics ("COE") to establish rules of conduct for all supervised persons. Supervised persons are individuals that are associated with our firm who are involved with offering or providing advisory services, including managing portfolios. The COE recognizes our portfolio managers' fiduciary responsibility to clients. The COE instructs our portfolio managers to conduct their affairs in such a manner as to avoid:

- Serving their own interests ahead of clients' interests
- Taking inappropriate advantage of their position
- Engaging in unacceptable actual or potential conflicts of interest

A copy of our COE is available upon request by calling our Compliance department at 800-223-0989.

Our portfolio managers are required to get preclearance for their personal trading activities. This means that a portfolio manager must receive approval from a member of our management team prior to buying or selling certain types of securities for his personal account. The fact that our portfolio managers can trade in their own accounts presents a conflict of interest. In certain cases, we do allow portfolio managers to buy and sell the same securities that are included in one or more of our investment strategies. This conflict is mitigated by the procedures detailed in our COE and Compliance Manual. We also conduct a post-trade review of all portfolio managers' and employees' account statements to ensure that our procedures are being followed.

## Item 12- Brokerage Practices

### *Soft Dollar Benefits*

Some firms in the industry receive benefits in exchange for delivering business to a broker/dealer or other third-party. These benefits are known as "soft dollars." Soft dollar benefits are generally defined as benefits (besides normal fees) received from a firm in



exchange for doing business with the firm. These benefits may include access to software, hardware, research, and/or office space. We do not currently receive any soft dollar benefits for choosing the broker/dealer through which we effect trades.

#### *Directed Brokerage*

We do not permit clients to direct us to execute transactions through a specified broker/dealer other than First Allied or National Financial Services ("Fidelity"). We rely on the relationship established by our affiliated entities to determine where we execute our transaction. We believe that First Allied allows us to achieve best execution because of their business relationships with Pershing, JP Morgan, and Fidelity, our access to First Allied's trading department, our ability to rely on First Allied's financial stability, and First Allied's overall service. Best execution factors include timeliness of execution, trader expertise, better pricing, and responsiveness.

#### *Aggregation of Client Trades*

When we trade for the accounts for which we are hired as a subadviser, we aggregate trades when appropriate. Aggregating trades is generally defined as "bunching" or combining trade orders for the same securities. Aggregating trades will not affect the transaction charges you are charged (or not charged) on such transactions in our investment strategies. When an aggregated trade order cannot be filled completely, we will generally attempt to provide each account involved in the aggregation a proportional number of shares, based upon the original order size.

In certain circumstances proportionately allocating an order that has not been filled entirely may not be in the best interest of each client. In these instances we will allocate the shares among the clients in a manner we believe to be fair to each client. We are under no obligation to aggregate trade orders or to average-price transactions.

For certain of the strategies, we delegate the execution of trading to Envestnet Asset Management, Inc. ("Envestnet") or other third-parties. In these situations, trading and rebalancing are executed according to the policies and procedures of Envestnet or the third-party leveraging our investment direction.

## Item 13- Review of Accounts

Our investment philosophy rests in the idea of an active management style. This means that we want to adjust our strategies to be in alignment with changing market conditions. We review our investment strategies throughout each business day, to make sure they are in line with our outlook.

The investment adviser sponsoring the programs that utilize our strategies may deliver performance reports to you. These performance reports will generally compare the performance of your account versus the performance of one or more benchmarks, including one or more blended benchmarks. A blended benchmark is a combination of market indexes in varying percentages. For each of our models, we recommend the selection of a benchmark that we feel is appropriate to be used as a standard against which relative performance can be measured. Most of our blended benchmarks consist of the S&P 500 Index, MSCI World Index, Barclay's U.S. Aggregate Index, and the 3-Month U.S. Treasury Bill rates in varying percentages. We also utilize the Russell 3000 Value Index and the Merrill Lynch High Yield Master Index in our blended benchmarks for certain strategies. The performance reports that your investment adviser delivers to you will identify which indexes are used in the blended benchmark that is listed on the report (if applicable).

## Item 14- Client Referrals and Other Compensation

All of our clients are firms, not individuals. These firms contract with the IARs that service your account. We, and our affiliates, may receive payments from product sponsors, including mutual fund companies. For more information about which product sponsors share revenue with either us or our affiliates, please reference <http://www.firstallied.com/conflicts> or the disclosure documents of firms who hire us.

If an affiliate receives payments from product sponsors for securities we manage, we may receive software, training, and conference support, based on the volume of securities we invest with the product sponsor.

## Item 15- Custody

As mentioned previously, we do not custody account assets. Account assets are custodied by an approved custodian selected by the program sponsor, usually either Pershing, JP Morgan, or Fidelity. The custodian of your account will send you account statements. These statements will be sent to you either quarterly or more frequently. You should review the account statements carefully and compare these account statements with the reports that may be sent to you by the program sponsor. Should you note any discrepancies, please contact your IAR.

To facilitate client transactions, First Allied accepts custody of client securities and deposits and forwards them to the approved custodian. This service gives First Allied custody. Because of an affiliate having custody, we hire an accounting firm to conduct an annual audit of our procedures.



## Item 16- Investment Discretion

We do not have discretion over your assets. However, when you invest in an account for which we serve as the portfolio manager, you are granting a full trading authorization either to us or to another investment adviser. Full trading authorization gives us (or the other investment adviser) the authority to place trades in your account based on our (or its) judgment. We will not remove funds or securities from your account.

## Item 17- Voting Client Securities

Generally, we vote proxies for the accounts that we are hired to manage. This authority is detailed in the account agreement you sign. We also vote proxies for the assets we manage in MFGI. We vote proxies in a manner that we believe is in your best interest.

In the event that a proxy proposal creates a conflict of interest between our interests and yours, we will obtain your consent to vote the proxy in a specific manner. When seeking your consent, we will provide you with sufficient information about the matter and the conflict to help you make an informed decision. Should you not respond to such a request, we will not vote the shares held by your account for the proposal in question. If you deny our request to vote the proxy a certain way, we will vote according to any instructions you provide to us.

We may refrain from voting proxies, if this is in your best interest. Please contact us for a list of any proxies we have voted on your behalf, which details how we voted.

## Item 18- Financial Information

### *Prepayment of Fees*

We do not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Generally, advisory fees for account management are paid to the program sponsor quarterly in advance.

### *FAAM's Financial Condition*

We are required to inform you of any financial conditions that are reasonably likely to impair our ability to meet contractual commitments to you. Currently, there are no financial conditions that would impair our ability to meet our contractual commitments to you. Should any arise, we will notify you according to SEC guidelines.



## **FORM ADV PART 2B BROCHURE SUPPLEMENT**

**Craig Columbus  
Jeffrey Mindlin  
Thomas Samuelson  
Brian Wright  
Lon Gerber  
Eitan Boral  
Collin Martin**

**First Allied Asset Management, Inc.  
655 West Broadway, 11<sup>th</sup> Floor  
San Diego, CA 92101  
800-499-5489  
<http://www.firstalliedam.com>**

This brochure supplement provides information about the investment adviser representatives listed above that supplements the First Allied Asset Management, Inc. Form ADV brochure. You should have received a copy of that brochure. Please contact First Allied Asset Management's Compliance department at (800)223-0989 if you did not receive that brochure or if you have any questions about the contents of this supplement. The information in this supplement has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about the investment adviser representatives listed above is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).





## **Craig Columbus**

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

#### *Educational Background*

Craig Columbus was born in 1967. Mr. Columbus attended Indiana University-Bloomington and graduated with a Doctor of Jurisprudence degree in Law in 1992. Mr. Columbus also attended Pennsylvania State University and graduated with a Master of Business Administration degree and he attended Loyola University-Chicago and graduated with a Bachelor of Arts degree in Economics.

#### *Business Experience*

Mr. Columbus' business experience for the last five years includes:

- 2006-present First Allied Asset Management, President
- 2004-2008 Greenbook Investment Management, Chief Market Strategist

### **Item 3- Disciplinary Information**

First Allied Asset Management discloses facts regarding any legal or disciplinary events that it deems to be material to a client's consideration of Mr. Columbus to act as their investment adviser representative. First Allied Asset Management is not aware of any events applicable to this item.

### **Item 4- Other Business Activities**

Mr. Columbus is not engaged in any outside business activities applicable to this item.

### **Item 5- Additional Compensation**

Mr. Columbus does not receive an economic benefit from any non-client for the provision of advisory services.

### **Item 6- Supervision**

Mr. Columbus gives investment advice to clients by selecting investments or creating methodology for the various programs for which First Allied Asset Management is the portfolio manager. Mr. Columbus is supervised by Robert Holcomb, Chief Marketing Officer of First Allied, who can be reached at (619)819-9026.



## **Jeffrey Mindlin, CFA**

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

#### *Educational Background*

Jeffrey Mindlin was born in 1979. Mr. Mindlin attended Arizona State University and graduated with a Bachelor of Science degree in Economics and Finance in 2001.

#### *Professional Designations*

Mr. Mindlin currently holds the Chartered Financial Analyst (CFA) designation. The CFA designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA charter, candidates must successfully complete three difficult examinations and gain at least three (3) years of qualifying work experience, among other requirements. In passing these examinations, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

#### *Business Experience*

Mr. Mindlin's business experience for the past five years includes:

- 2006-present                      First Allied Asset Management, Sr. Managing Director/Chief Portfolio Strategist
- 2005-2008                        Greenbook Investment Management, Director of Research/Co-Portfolio Manager

### **Item 3- Disciplinary Information**

First Allied Asset Management discloses facts regarding any legal or disciplinary events that it deems to be material to a client's consideration of Mr. Mindlin to act as their investment adviser representative. First Allied Asset Management is not aware of any events applicable to this item.

### **Item 4- Other Business Activities**

Mr. Mindlin is not engaged in any outside business activities applicable to this item.

### **Item 5- Additional Compensation**

Mr. Mindlin does not receive an economic benefit from any non-client for the provision of advisory services.

### **Item 6- Supervision**

Mr. Mindlin gives investment advice to clients by selecting investments or creating methodology for the various programs for which First Allied Asset Management is the portfolio manager. Mr. Mindlin is supervised by Craig Columbus, President of First Allied Asset Management, who can be reached at (619)819-9026.



## **Thomas Samuelson CFA, CMT**

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

#### *Educational Background*

Thomas Samuelson was born in 1960. Mr. Samuelson attended The University of Tulsa and graduated with a Master of Business Administration degree in 1984 and a Bachelor of Science degree in Engineering.

#### *Professional Designations*

Mr. Samuelson currently holds the Chartered Financial Analyst (CFA) designation. The CFA designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA charter, candidates must successfully complete three difficult examinations and gain at least three (3) years of qualifying work experience, among other requirements. In passing these examinations, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

Mr. Samuelson also holds the Chartered Market Technician (CMT) designation. The CMT Program is a certification process in which candidates are required to demonstrate proficiency in a broad range of technical analysis subjects. Administered by the Accreditation Committee of the Market Technicians Association (MTA), Inc., the Program consists of three levels. CMT Level 1 and CMT Level 2 are multiple choice exams while CMT Level 3 is in essay form. Candidates for the CMT designation must complete all three levels of the CMT Exam and must be employed in a professional analytical or investment management capacity for a minimum period of 3 years.

#### *Business Experience*

Mr. Samuelson's business experience for the past five years includes:

- 2006-present First Allied Asset Management, Chief Investment Officer/Portfolio Manager
- 2005-2008 Greenbook Investment Management, Chief Investment Officer/Portfolio Manager

### **Item 3- Disciplinary Information**

First Allied Asset Management discloses facts regarding any legal or disciplinary events that it deems to be material to a client's consideration of Mr. Samuelson to act as their investment adviser representative. First Allied Asset Management is not aware of any events applicable to this item.

### **Item 4- Other Business Activities**

Mr. Samuelson is not engaged in any outside business activities applicable to this item.

### **Item 5- Additional Compensation**

Mr. Samuelson does not receive an economic benefit from any non-client for the provision of advisory services.

### **Item 6- Supervision**

Mr. Samuelson gives investment advice to clients by selecting investments or creating methodology for the various programs for which First Allied Asset Management is the portfolio manager. Mr. Samuelson is supervised by Jeffrey Mindlin, Sr. Managing Director/Chief Portfolio Strategist of First Allied Asset Management, who can be reached at (866)299-4864.



## **Lon Gerber**

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

#### *Educational Background*

Lon Gerber was born in 1967. Mr. Gerber attended Pennsylvania State University and graduated with a Master of Business Administration degree in 1994. Previously, Mr. Gerber attended Binghamton University and graduated with a Bachelor of Science degree in Management.

#### *Business Experience*

Mr. Gerber's business experience for the past five years includes:

- 2007-present First Allied Asset Management, Chief Operating Officer
- 2007-2008 Greenbook Investment Management, Co-Portfolio Manager
- 1996-2007 Thomson Financial, Vice President/Director of Research

### **Item 3- Disciplinary Information**

First Allied Asset Management discloses facts regarding any legal or disciplinary events that it deems to be material to a client's consideration of Mr. Gerber to act as their investment adviser representative. First Allied Asset Management is not aware of any events applicable to this item.

### **Item 4- Other Business Activities**

Mr. Gerber is not engaged in any outside business activities applicable to this item.

### **Item 5- Additional Compensation**

Mr. Gerber does not receive an economic benefit from any non-client for the provision of advisory services.

### **Item 6- Supervision**

Mr. Gerber gives investment advice to clients by selecting investments or creating methodology for the various programs for which First Allied Asset Management is the portfolio manager. Mr. Gerber is supervised by Jeffrey Mindlin, Sr. Managing Director/Chief Portfolio Strategist of First Allied Asset Management, who can be reached at (866)299-4864.



## **Brian Wright, CFA**

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

#### *Educational Background*

Brian Wright was born in 1975. Mr. Wright attended Boston University and graduated with a Bachelor of Arts degree in Economics in 1997.

#### *Professional Designations*

Mr. Wright currently holds the Chartered Financial Analyst (CFA) designation. The CFA designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA charter, candidates must successfully complete three difficult examinations and gain at least three (3) years of qualifying work experience, among other requirements. In passing these examinations, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

#### *Business Experience*

Mr. Wright's business experience for the past five years includes:

- 2006-present First Allied Asset Management, Senior Portfolio Manager
- 2005-2008 Greenbook Investment Management, Head Trader/Co-Portfolio Manager

### **Item 3- Disciplinary Information**

First Allied Asset Management discloses facts regarding any legal or disciplinary events that it deems to be material to a client's consideration of Mr. Wright to act as their investment adviser representative. First Allied Asset Management is not aware of any events applicable to this item.

### **Item 4- Other Business Activities**

Mr. Wright is not engaged in any outside business activities applicable to this item.

### **Item 5- Additional Compensation**

Mr. Wright does not receive an economic benefit from any non-client for the provision of advisory services.

### **Item 6- Supervision**

Mr. Wright gives investment advice to clients by selecting investments or creating methodology for the various programs for which First Allied Asset Management is the portfolio manager. Mr. Wright is supervised by Jeffrey Mindlin, Sr. Managing Director/Chief Portfolio Strategist of First Allied Asset Management, who can be reached at (866)299-4864.





## **Eitan Boral**

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

#### *Educational Background*

Eitan Boral was born in 1981. Mr. Boral attended the University of Wisconsin and graduated with a Bachelor of Arts degree in Economics and Philosophy in 2004.

#### *Business Experience*

Mr. Boral's business experience for the past five years includes:

- 2008-present First Allied Asset Management, Assistant Portfolio Manager
- 2005-2007 Logical Information Machines, Account Manager

### **Item 3- Disciplinary Information**

First Allied Asset Management discloses facts regarding any legal or disciplinary events that it deems to be material to a client's consideration of Mr. Boral to act as their investment adviser representative. First Allied Asset Management is not aware of any events applicable to this item.

### **Item 4- Other Business Activities**

Mr. Boral is not engaged in any outside business activities applicable to this item.

### **Item 5- Additional Compensation**

Mr. Boral does not receive an economic benefit from any non-client for the provision of advisory services.

### **Item 6- Supervision**

Mr. Boral gives investment advice to clients by selecting investments or creating methodology for the various programs for which First Allied Asset Management is the portfolio manager. Mr. Boral is supervised by Jeffrey Mindlin, Sr. Managing Director/Chief Portfolio Strategist of First Allied Asset Management, who can be reached at (866)299-4864.



## **Collin Martin**

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

#### *Educational Background*

Collin Martin was born in 1981. Mr. Martin attended The Ohio State University and graduated with a Bachelor of Science degree in Real Estate and Urban Analysis in 2004.

#### *Business Experience*

Mr. Martin's business experience for the past five years includes:

- 2011-present First Allied Asset Management, Investment Consultant
- 2007-2011 First Allied Securities, Quality Assurance Specialist

### **Item 3- Disciplinary Information**

First Allied Asset Management discloses facts regarding any legal or disciplinary events that it deems to be material to a client's consideration of Mr. Martin to act as their investment adviser representative. First Allied Asset Management is not aware of any events applicable to this item.

### **Item 4- Other Business Activities**

Mr. Martin is not engaged in any outside business activities applicable to this item.

### **Item 5- Additional Compensation**

Mr. Martin does not receive an economic benefit from any non-client for the provision of advisory services.

### **Item 6- Supervision**

Mr. Martin gives investment advice to clients by selecting investments or creating methodology for the various programs for which First Allied Asset Management is the portfolio manager. Mr. Martin is supervised by Jeffrey Mindlin, Sr. Managing Director/Chief Portfolio Strategist of First Allied Asset Management, who can be reached at (866)299-4864.