



Client 1st Advisory Group LLC

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This brochure provides information about the qualifications and business practices of Client 1st Advisory Group LLC. If you have any questions about the contents of this brochure, please contact us at 727-450-2301 or by email at: [info@ c1ag.com](mailto:info@c1ag.com). 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.

Additional information about us is also available on the SEC's website at www.advisorinfo.sec.gov

SUMMARY OF MATERIAL CHANGES

The Material Changes section of this brochure will be updated at least annually to describe material changes that have occurred since the most recent Brochure update. Since this is the first brochure for Client 1st Advisory Group LLC, the successor to Client 1st Advisors, Inc. and Wealth Management Consultants, Inc., there are no material changes to report.

In the future, this section will discuss only specific material changes that are made to the brochure and provide you with a summary of such changes. We will also reference the date of the last update of our brochure.

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ADVISORY BUSINESS

In this brochure, references to “we”, “us”, “our”, “our firm”, “the firm” “the Company” and “Client 1st” refers to Client 1st Advisory Group LLC. Individuals who serve as our directors, officers, and representatives are referred to as our “advisors” “investment advisory representatives” or “IARs”. Our firm’s clients are referred to as “you” “your” or “our clients”.

Client 1st Advisory Group LLC was formed under the laws of the State of Florida in March 2013 as the successor to Client 1st Advisors, Inc. and Wealth Management Services, Inc. The firm is registered with the United States Securities and Exchange Commission as an investment advisor.

Our managing members are Craig Phillips, CEO, Michelle Mabry, President and Dave Stieh, Director of Operations. Vicki Morgan is our firm’s Chief Compliance Officer.

Client 1st offers personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations. Services and fee arrangements are described in the following pages.

OUR ADVISORY SERVICES

We provide personalized financial planning and portfolio management services. Most of our clients are individuals and revocable grantor trusts. However, we also work with family limited partnerships, pension and profit sharing plans, estates, charitable organizations and small businesses. We also provide financial consulting services to Employer sponsored retirement plans.

We provide advice to our clients through our “Consultative Client Management Program. This process involves a series of meetings to (1) determine your financial goals and objectives, (2) present you with an investment plan, (3) form a mutual commitment to the plan and (4) schedule progress meetings on a quarterly basis.

We work with other professionals (e.g. lawyers or accountants) who are directly engaged by our clients to assist on an as-needed basis.

Investment Management

Client 1st provides customized asset management services by gathering relevant information about your current financial needs, objectives, existing financial assets, investment experience and risk tolerance. All aspects of your financial affairs are reviewed. We use this information to create a Plan called a Dynamic Investment Policy Statement (“DIPS”). This Plan (DIPS) forms the basis of the asset allocation model that we will use to manage your investments. The DIPS is a dynamic process that changes with adjustments to your goals and objectives and the financial markets that we invest in on your behalf.

A key element of our regular progress meetings in our Consultative Client Management Program is to revisit this process on a quarterly basis. The DIPS can also be revisited on demand when a material change in your financial situation occurs. A Plan review, even when changes are made, may not result in a change in your asset allocation. But when a change in asset allocation is determined to be necessary, the resulting Plan becomes the current and valid DIPS.

When creating or adjusting your asset allocation based on the DIPS, we contract with third party, unaffiliated asset managers to manage the investment portfolio that complements your investment profile. These third party asset managers are selected by our due diligence process that reviews their investment strategies, experience, performance record, integrity, and regulatory history. We continue to monitor the performance of these investment managers and change managers if necessary based on their performance and changes in your profile.

Our Firm’s minimum account size for investment management is \$250,000 of assets under management. Craig Phillips and Michelle Mabry require a \$1 million account minimum to serve as lead advisor for any client or household. Client 1st reserves the right to waive the account minimum.

Financial Planning and Consulting

We offer financial planning services to you on matters involving securities and non-securities topics. The areas addressed may include retirement income planning, estate planning, budgeting and cash flow analysis, business succession planning, education planning and other areas where you may require assistance. Your IAR may prepare special reports on these matters at your request.

As is the case with our investment management program, our financial plans are based on the financial information that you disclose to us at the time the plan is presented to

you. Client 1st does not offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review any plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. As your financial situation, goals, objectives, or needs change, you will need to promptly notify Client 1st and your investment advisory representative so that we can make adjustments to your plan.

You are under no obligation to act on our financial planning recommendations. Moreover, if the financial plan that we prepare requires investment management you are under no obligation to implement the financial plan through Client 1st.

Retirement Plan Consulting

Client 1st offers its qualified advisors a fee-for-service consulting program whereby advisors may offer one-time or ongoing advisory services to qualified retirement plans. Through the Retirement Plan Consulting program, qualified advisors may assist plan sponsors with their fiduciary duties and provide individualized advice based upon the particular needs of the plan and/or plan participants regarding investment management matters, such as:

- Investment Policy Statement support
- Investment selection and monitoring
- Overall portfolio composition
- Participant advice programs

ASSETS UNDER MANAGEMENT

We manage your assets on either a discretionary or nondiscretionary basis. As of May 2, 2013, we had total assets under management of \$148,242,048, of which \$134,142,048 in client assets were managed on a discretionary basis and \$14,100,000 were managed on a non-discretionary basis.

FEES AND COMPENSATION

INVESTMENT MANAGEMENT FEES

Advisor Fees

Our fee is billed quarterly in advance. The fee is based on the market value of the account on the last business day of the preceding calendar quarter. The quarterly fee is

one fourth (1/4) of the annual fee rate. The market values are also separately provided to you by the custodian. We urge our clients to compare both statements. If errors are discovered in the firm's favor, we credit or refund such amount, with no time limit.

The first billing cycle begins on the account inception date and is based on the account value on the inception date as determined by your broker-dealer or other qualified custodian. We prorate the fee for new accounts based on the number of days remaining in the calendar quarter. The quarterly billing value is equal to the closing market value of the account on the last business day of the quarter.

Although our fees for our services may be negotiated under certain circumstances, our standard fee schedule is as follows:

<u>PORTFOLIO SIZE</u>	<u>ANNUAL % ASSET MGT</u>
250,000 TO 499,999	1.50%
500,000 TO 999,999	1.25%
1,000,000 TO 4,999,999	1.00%
5,000,000 & Above	Negotiable

Our fees are based on the aggregate value of related accounts, the complexity of the the account and the investment strategies employed. We will specify the amount and the manner in which we charge fees in our written agreement with you.

Upon your authorization, the custodian of your assets will deduct the advisory fee from your account

Outside Manger Fees

In addition to our advisory fees, you may also incur fees imposed by the outside money managers and their corresponding custodians that we may choose on your behalf. The fee for the outside managers and custodians ranges from 0.5% to 1.25% depending on the investment strategies and size of the account.

Other Fees and Expenses

In addition to management fees, accounts may be subject to transaction fees assessed by third parties Transaction fees or commissions charged by broker/dealers executing the transactions and custodians maintaining your assets are separate in addition to the asset management fees and are non-negotiable. Any transaction fees are billed by the broker/dealer or custodian.

Moreover, If the manager that we choose is investing in funds, you will also incur expenses at the fund level. "Investment company shares" or "funds" of which the most common types are mutual funds, index funds, exchange-traded funds ("ETFs") and unit investment trusts ("UITs") charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees and expenses generally include a management fee, shareholder servicing, portfolio transaction costs, other fund expenses, and sometimes a distribution fee. These separate fees are disclosed in each fund's current prospectus, which is available from the sponsor and, upon request, from us. The expenses at the fund level range from 0.15 % to 0.75%.

FINANCIAL PLANING AND CONSULTING FEES

The Client 1st Financial Planning and Consulting Program provides clients with the option of paying an annual fee for ongoing services, a flat fee, or an hourly rate not to exceed \$350 per hour. The fee amount a client will pay is negotiable between the Client and his or her advisor and may either be paid at the time of service, in advance of service, or in arrears. Annual fees may be paid in monthly, quarterly, semiannual, or annual installments as agreed to between the client and the advisor.

In some circumstances, implementing the recommendations in financial plans may involve investment or insurance products that result in a commission or other fee being paid to a registered representative of a broker / dealer. Client 1st advisors are not registered representatives of a broker/dealer and do not receive commissions or 12(b)-1 fees. However, some of our advisors are registered insurance agents and may receive commissions for fixed insurance products. In instances where a client pays a fee for financial planning advice, the client is notified in advance of any such transactions resulting in a commission being paid to an associated person of Client 1st.

RETIRMENT PLAN CONSULTING

The Client 1st Retirement Plan Consulting program provides clients with the option of paying an annual fee for ongoing services based on a percentage of assets under advisement, a flat fee, or an hourly rate The fee amount a client will pay is negotiable between the client and the advisor. Fees may be paid directly from qualified plan assets or may be direct billed, as agreed to between the client and the advisor.

TERMINATION OF AGREEMENTS

You may terminate any Investment Advisory Agreement, Financial Planning Agreement by notifying Client 1st in writing.

For Investment Management Agreements you may terminate the Agreement for any reason within five (5) days of the contract date. After 5 days the quarterly advanced fee that you paid is non-refundable. Going forward the Agreement may be terminated by either party upon written notice to the other party and will become effective on the date received by the other party ("termination date"). You will be obligated to pay fees through the termination date.

For Financial Plan Consulting Agreements and Retirement Plan Consulting Agreements, you may terminate the agreement at any time and a refund of unearned fees will be provided to you. The unearned fee will be calculated by Client 1st and your advisor and is based on the amount of time the advisor has spent working for you before you terminated the agreement. A full refund will be made if you terminate your agreement within 5 business days of signing the agreement.

Client 1st may also terminate the above-referenced agreements by written notification if pertinent information to the planning process has not been provided. Any unused portion of advanced fees will be refunded within 15 days.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets).

TYPES OF CLIENTS

Our investment management and financial planning services are available to individuals, revocable grantor trusts, pension and profit sharing plans, estates, charitable organizations and small businesses.

For investment management services our Firm's minimum account size is \$250,000 of assets under management. Craig Phillips and Michelle Mabry require a \$1 million account minimum to serve as lead advisor for any client or household. We may require you to add to the amount in order to maintain the minimum or request that the account be terminated. These conditions are negotiable in light of your specific circumstances and relationships with our firm and our principals and representatives. Client 1st reserves the right to waive the account minimum. There is no minimum asset size for our fee-based financial planning services .

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Generally speaking our goal at Client 1st is to help you achieve your stated investment objectives by selecting a mix of investment products and asset managers that provide the highest returns at an acceptable level of risk within your stated time frame.

METHODS OF ANALYSIS

We determine the appropriate asset mix and asset allocation through analysis of potential asset classes for the period of your given time horizon. In the course of determining the appropriate investment assets and allocations, we also attempt to incorporate your existing investment assets into the mix.

In performing our analysis we utilize research software created by third parties that incorporate performance and statistical probability of the existing investment asset classes. We also utilize other information sources both public and purchased including financial publications, prospectuses and annual reports.

INVESTMENT STRATEGIES

The portfolio of investment assets based on the allocation strategy may include but not be limited to various combinations of stocks, bonds, mutual funds, exchange traded funds (“ETFs”) and to a limited extent “alternative investments” such as Real Estate Investment Trusts (“REIT’s), limited partnerships, master limited partnerships (“MLP’s), Commodity Trading Advisors (CTA’s), Fixed Income and Equity Long Short funds, Absolute Return Funds, etc.

We may select appropriate models and/ or outside money managers that incorporate your asset allocation and corresponds to your means, goals, objectives an risk tolerance.

Typically we establish your investment portfolio in a Unified Managed Account (“UMA”). A UMA is a professionally managed private investment account that is rebalanced regularly and permits us to open multiple accounts and utilize multiple types of investments. We track and monitor the performance of your portfolio on a regular basis to ensure that the performance is on track to meet the financial objectives that we established. You will also be provided with quarterly reports (either electronically or by mail) of your portfolio’s performance.

RISK OF LOSS

We offer advice about a wide variety of investment types, including mutual funds, index funds, ETFs, and fixed and variable annuities, each having different types and levels of risk. We will discuss these risks with you in determining the investment objectives that will guide our investment advice for your account. We will explain and answer any questions you have about these kinds of investments, which present special considerations such as the following.

Investing in securities involves risk of loss that you should be prepared to bear. Obtaining higher rates of return on investments typically entails accepting higher levels of risk. We work with you to attempt to identify the balance of risks and rewards that is appropriate and comfortable for you. However, it is still your responsibility to ask questions if you do not fully understand the risks associated with any investment or investment strategy.

Also, while we strive to render our best judgment on your behalf, many economic and market variables beyond our control can affect the performance of your investments and we cannot assure you that your investments will be profitable or assure you that no losses will occur in your investment portfolio. Past performance is one relatively important consideration with respect to any investment or investment advisor, but it is not a predictor of future performance.

Please be advised that all investment programs have certain risks that are borne by you, 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 individual real estate properties are not.

Financial Risk: Excessive borrowing (leverage) 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.

DISCIPLINARY INFORMATION

Registered Investment advisors are required to disclose all matters regarding any legal or disciplinary events involving our firm or any of our representatives. We have no items to report.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We participate in a network of financial service providers who periodically gather to share professional ideas and experiences. Other participants of this network may refer prospective clients to our firm for its expertise, and we may refer clients to other network participants for their expertise. These professional referrals come from, estate planning attorneys and accountants. Unless separately disclosed to you, these are made on an uncompensated basis. Participants will, however, benefit from future cross-referrals.

If compensation will be paid for the referral, then you will receive a specific disclosure brochure about the nature of the referral, the referral relationship, and the referral compensation (See below "Client Referrals and Other Compensation"). Compensation or future benefits that we or other network participants receive from referrals creates conflicts of interests and you should carefully consider in proceeding with such referrals.

You are never obligated to accept a referral and will not be charged any additional fee for it.

Some of our IARs are registered insurance agents and occasionally may receive commissions on fixed insurance products. You will be notified in advance of any such transactions resulting in a commission being paid to an associated person of Client 1st. (See above "Financial Planning and Consulting Fees" and below "Client Referrals and Other Compensation") The additional compensation creates conflicts of interest that you should consider before engaging our services.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

CODE OF ETHICS

We have adopted a Code of Ethics (the "Code") describing the standards of business conduct we expect all officers, directors, employees, and advisory representatives to follow. It expresses our core fundamental values to be honest, fair, and forthright in our dealings with clients and others in the conduct of our business.

Our Code also guides our practices in giving investment advice to our clients and personal trading of securities for our employees and their related accounts. The Code also describes certain reporting requirements with which particular individuals, associated with or employed by us, must comply. You may request a copy of our Code by contacting our Chief Compliance Officer, Vicki Morgan at (727) 450-2301.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Client 1st employees and representatives may benefit from their purchases or sales of investments that we recommend to you and we may buy or sell securities that are also held by our clients. However, employees may not trade their own securities ahead of our clients' trades.

PERSONAL TRADING

Our Chief Compliance Officer reviews all employee trades each quarter. The personal trading reviews ensure that personal trading by our employees does not affect the market and If any irregularities are noted, the firm's President is advised.

BROKERAGE PRACTICES

SELECTING BROKERAGE AND CUSTODIAL SERVICES

Client 1st selects brokerage service relationships that include custody of securities, trade execution, clearance and settlement of transactions. The factors that we considered in selecting our brokerage and custodial services include:

- Range of securities offered: stocks, bonds, mutual funds, ETFs, Alternative Investments
- Low transaction costs
- Access to client data
- Monthly/ quarterly reports to clients
- Capability of supporting 3rd party money managers
- In-house research capabilities
- Overlay functions for customizing asset allocations
- Back-office support facilitating management of multiple Client accounts

We have established primary custodial and brokerage service relationships with two independent SEC-registered broker/dealers, **T.D. Ameritrade, Inc.** and **Pershing LLC**. T.D Ameritrade and Pershing are unaffiliated with each other and are not affiliated with Client 1st. We receive some benefits from these relationships that are outlined below under “Client Referrals and Other Compensation”.

SELECTING MONEY MANAGERS AND MODELS

We choose money managers and portfolio models (controlled by money managers) that correspond with the asset allocations that we develop for you based on your means, goals, objectives and risk tolerance.. A model is an asset allocation template on the UMA platform that provides a basis for portfolio construction and maintenance. The criteria that we use for selecting our models and mangers includes but is not limited to reviewing following factors:

- Performance— 1, 3 and 5 year performance and historical quarterly returns.
- Volatility— the asset mix and returns on a risk basis.
- Expenses— costs and fees being charged for the asset types.
- Credentials—the training, education and experience of the mangers
- Regulatory History—and disciplinary events with the SEC, SROs or States.

BEST EXECUTION AND TRADING FEES

Client 1st relies on reviews on execution of trades at each custodian each quarter by the broker-dealers. We do not receive any portion of the trading fees charged by the broker-dealers.

AGGREGATION OF ORDERS

We do not aggregate client orders. Our third party money managers aggregate orders.

SOFT DOLLAR ARRANGEMENTS

We do not participate in any “soft dollar” arrangements where client commissions are partially rebated in the form of research credits or other benefits. Nor does any brokerage firm or custodian refer clients to our firm; neither as a matter of course nor in consideration for using their brokerage services.

REVIEW OF ACCOUNTS

If we provide you with asset management services, we conduct review meetings, with you at your request, at the time of significant new deposits or withdrawals, during substantial changes in market conditions, and at least on an annual basis.

You must contact us when a significant change in your financial condition occurs, so that we can review your portfolio along with your new information to insure the investment strategies continue to be appropriate. Other conditions that may trigger a review are volatile market conditions and changes in the tax laws.

We review your accounts on a quarterly basis. Account reviewers are members of our Investment Committee. They consider your current security positions, models and money manager and the likelihood that the performance of each security, investment model or money manager will contribute or continue to contribute to your investment objectives.

In some cases we prepare portfolio reports. It depends on the size of the client’s account and whether or not the money manager, broker/ dealer or custodians that are involved in the relationship regularly produce reports. In most cases written reports are

produced by our custodians and 3rd party money managers and are provided directly to our clients or distributed by our IARs. In addition, our clients receive statements from executing broker/dealers and custodians, as appropriate.

CLIENT REFERRALS AND OTHER COMPENSATION

Client 1st has been fortunate to receive many client referrals. The referrals come from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources.

Occasionally we enter into solicitor agreements with accounting firms other professional firms or individuals who have referred friends and associates or to our Firm. Under these agreements the solicitor is compensated for their referral by sharing the annual management fee earned by Client 1st. If you become our client as a result of the solicitor's efforts, you will receive a separate solicitor's disclosure brochure describing our solicitation arrangements, the compensation we pay to the solicitor, and the terms of that relationship. You will also receive a copy of this brochure. Generally, any such agreement will provide for payment to the solicitor as a percentage of the advisory fees we collect from you. We do not charge clients introduced by such solicitors a higher advisory fee as a result of our obligation to pay for the solicitation services.

Our President, Michelle Mabry, has entered into a joint venture with the accounting firm of Donnell & Hicks P.A. to provide accounting and business consulting services. Under this arrangement Ms Mabry receives fee compensation from the accounting firm for client referrals.

As disclosed above under "Brokerage Practices", we utilize TD Ameritrade, Inc and Pershing LLC as our primary brokerage and custodial service providers. Although, there is no direct link between our use of these service providers and the investment advice that we provide to you, we do receive economic benefits for using these providers that are not available to retail investors. These benefits include the following products and services (provided without cost or at a discount) : receipt of duplicate Client statements and confirms; research related products and tools; consulting services; access to a trading desks that serve advisors exclusively; access to block trading that allows us to aggregate securities for more cost-efficient and timely execution and then allocate the appropriate shares to our Clients' accounts; the ability to have our fees deducted directly from our Clients' accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees; access to institutional money managers; and compliance, marketing, technology,

and practice management products or services provided to our Firm by third party vendors without cost or at a discount. As part of our fiduciary duty we endeavor at all times to put the interests of our Clients first and foremost. Clients should be aware, however, that these benefits in and of themselves create a potential conflict of interest and may unduly influence our choice of T.D. Ameritrade and Pershing LLC for custody and brokerage services.

Some of our IARs are registered insurance agents and may occasionally receive commissions on fixed insurance products that is in addition to our investment management and financial planning fees.

CUSTODY

Assets are held at qualified custodians. The custodians provide account statements directly to you at your address of record at least quarterly. Client 1st does not take custody of Clients' securities. (See a "Brokerage Practices" above).

In very limited circumstances we act as a trustee for clients. As a trustee, we are deemed to have custody under SEC Rules. To maintain this relationship we undergo an annual audit by an Accountant designated by the Public Company Accounting Oversight Board (PCAOB).

We urge you to compare the account statements received directly from your custodians to the performance report statements provided to you by Client 1st .

INVESTMENT DISCRETION

You designate Client 1st as your agent and attorney-in-fact to determine appropriate Account investments based on your financial circumstances and investment objectives. Our advisor can accordingly select and remove money managers, unified managed accounts (UMAs) mutual funds, managed future funds and exchange traded funds (ETFs). The trading discretion granted to Client 1st does not authorize Advisor to withdraw funds or assets from the Account.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment plan that you have approved in writing and allows us to periodically rebalance your accounts to maintain the asset allocation strategy for meeting your goals and objectives.

VOTING CLIENT SECURITIES

As a matter of firm policy and practice, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in your account. Proxy solicitation materials will be forwarded to you for response and voting.

Similarly, we will not be responsible for responding to class action litigation for securities held in your held in your portfolio. Class action litigation materials that we may receive on your behalf will be forwarded to you for response.

FINANCIAL INFORMATION

As a registered investment adviser, we are required to provide you with certain financial information or disclosures about our financial condition or if we have financial commitments that impair our ability to meet contractual and fiduciary commitments to you. We have not been the subject of a bankruptcy proceeding and do not have any financial commitments that would impair our ability to meet any contractual or fiduciary commitments to you.

BROCHURE SUPPLEMENT (PART 2B OF FORM ADV)

The following brochure supplement provides information about **Craig Phillips, Michelle Mabry, Dave Stieh, Vicki Morgan, Julie Talbot** and **Herbert Pontzer** and is part of the Client 1st brochure. Please contact Vicki Morgan at 727-450-2301 if you have any questions about the contents of this supplement:

CRAIG PHILLIPS

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Craig Phillips was born in March 1950. After high school, he earned a Bachelor's Degree from Florida State University in 1973. Mr. Phillips was employed as a consultant to Fortune 500 businesses from 1973 to 1990. He was employed as an associate of ProVise Management Group, a registered investment advisor from 1990 to 2001. Craig is managing member and CEO of Client 1st. Mr. Phillips has also been a registered principal of two independent broker/dealer firms, Intersecurities Inc from 1996 until 2006 and Cascade Financial Management, Inc. from 2006 until 2012.

Mr. Phillips is a Certified Financial Planner (CFP[®]). To obtain this designation, Mr Phillips completed the financial planning education requirements in nine major planning areas set by the CFP Board and successfully completed the Candidate Fitness Standards and background check. To maintain this designation Mr. Phillips completes 30 hours of continuing education every two years. Prerequisites for the CFP designation include a Bachelor's degree from an accredited college or university and three years of qualified work experience.

Mr. Phillips is an Accredited Investment Fiduciary (AIF[®]). To obtain the AIF[®] designation, had to complete either a self-study module or a combination of a classroom and self-study module then had to pass a closed-book, proctored examination to complete the course of study. To maintain the designation, your advisor completes six hours of continuing education every year.

Mr. Phillips is a registered insurance agent with the state of Florida. In addition to passing the insurance licensing examination, Mr. Phillips is required to complete 24 hours of continuing education every two years.

DISCIPLINARY INFORMATION---None

OTHER BUSINESS ACTIVITIES

In addition to his responsibilities as CEO and a managing member of Client 1st, Mr. Phillips is a former member of the Board of Directors of the Tampa Bay affiliate of the Financial Planning Association (FPA) and is a current Trustee and former Chairman of the Board of Directors for Directions for Mental Health, Inc. He is past Treasurer and Acting Chair and current Vice Chair of the Early Learning Coalition of Pinellas County. He is former Chairman of the Humane Society of Pinellas' Foundation Board and is a current member of the Board of Directors of the Clearwater Free Clinic.

ADDITIONAL COMPENSATION

As a licensed insurance agent Mr. Phillips may receive commissions or trail fees based on the sales of fixed insurance products.

SUPERVISION

Mr. Phillips is the Firm's Chief Executive Officer and is responsible for the Firm's overall supervisory program. Mr. Phillips relies on his knowledge, experience and adheres to the Firm's Code of Ethics in conducting the Firm's business and in providing services to his clients.

MICHELLE MABRY

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Michelle Mabry was born in 1967. In 1988, she earned a Bachelor of Science degree from Louisiana State University with a double major in Economics and International Trade and Finance. Ms. Mabry began her career at IDS Financial (which later became American Express Financial Advisors). She was a Senior Financial Advisor and had an independent branch office with Ameriprise Financial when they spun off from American Express (1989-2008). In 2008, Ms. Mabry formed Wealth Management Consultants, Inc. Ms Mabry is President and a managing member of Client 1st.

Ms. Mabry is an Accredited Investment Fiduciary (AIF[®]). To obtain the AIF[®] designation, your advisor had to complete either a self-study module or a combination of a classroom and self-study module then had to pass a closed-book, proctored examination to complete the course of study. To maintain the designation, your advisor completes six hours of continuing education every year.

Ms. Mabry is a Certified Financial Planner (CFP[®]). To obtain this designation, Ms. Mabry completed the financial planning education requirements in six major planning areas set by the CFP Board and successfully completed the Candidate Fitness Standards and background check. To maintain this designation Ms. Mabry completes 30 hours of continuing education every two years. Prerequisites for the CFP designation include a Bachelor's degree from an accredited college or university and three years of qualified work experience.

Ms. Mabry is a registered insurance agent with the state of Mississippi. In addition to passing the insurance licensing examination, Ms. Mabry is required to complete 12 hours of continuing education every two years.

DISCIPLINARY INFORMATION

Michelle Mabry does not have any material disciplinary history

OTHER BUSINESS ACTIVITIES

Ms Mabry is involved in the following additional activities that are investment related

Mabry Donnell & Hicks LLC –CEO/Owner of LLC which performs accounting and business consulting services.

Fixed Life Insurance Sales

Wealth Management Consultants Corporation—Sole owner

Pinebelt Community Foundation –Board member, Investment Committee

TM Associates, LLC—Managing Member Real Estate Holding Company

ADDITIONAL COMPENSATION

As a licensed insurance agent Ms. Mabry may receive commissions or trail fees based on the sales of fixed insurance products.

SUPERVISION

Ms. Mabry is supervised by Craig Phillips, CEO and a managing member of Client 1st. Mr. Phillips may be reached at 727-450-2301 ext 108 or craig@c1ag.com.

Mr. Phillips or his qualified designee supervises the activities of Ms Mabry's work through a number of supervisory activities that may include but not be limited to the following:

- Review of new account applications, client profiles and investment strategies
- Review of personal account transactions
- Periodic audits of the office location.
- Through our client relationship management system.

DAVE STIEH

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

David Stieh was born in February 1974. After high school, he earned a Bachelor's Degree in Finance from the University of Central Florida in 1988. Mr.Stieh was employed with Western Reserve Life from 1999 until 2006. During that period Mr. Stieh became a registered representative with InterSecurities, Inc., a subsidiary of Western Reserve Life (n.k.a TransAmerica Advisors, Inc.), and was also employed as a Tax Counselor with H&R Block. Mr Stieh is Chief Operations Officer (COO) and a managing member of Client 1st.

Mr. Stieh is a registered insurance agent with the state of Florida. In addition to passing the insurance licensing examination, Mr. Stieh is required to complete 24 hours of continuing education every two years.

DISCIPLINARY INFORMATION---None

OTHER BUSINESS ACTIVITIES

In addition to his responsibilities as COO and as an IAR of Client 1^s, Mr. Stieh is the Treasurer of the Dunedin, FL North Rotary Club and is active on the Rotary Foundation Committee. Dave is also a Paul Harris Fellow.

ADDITIONAL COMPENSATION

As a licensed insurance agent Mr. Stieh may receive commissions or trail fees based on the sales of fixed insurance products.

SUPERVISION

Mr. Stieh is supervised by Craig Phillips, CEO and a managing member of Client 1st . Mr. Phillips may be reached at 727-450-2301 ext 108 or craig@c1ag.com.

Mr. Phillips supervises the activities of Mr Stieh through a number of supervisory activities that may include but not be limited to the following:

- Review of new account applications, client profiles and investment strategies
- Frequent office and remote interactions
- Review of personal account transactions
- Through our client relationship management system.

VICKI MORGAN

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Vicki Morgan was born in October 1948. After high school, she attended St.Petersburg Junior College from 1966 through 1967 and Hillsborough Community College from 1972 through 1973. Ms. Morgan was employed with Stewart Title, Inc. from 1968 until 1975 and Phillips Engineering Company, Inc from 1981 until 1986. Vicki is Chief Compliance Officer (CCO) of Client 1st.

DISCIPLINARY INFORMATION---None

OTHER BUSINESS ACTIVITIES

In addition to her responsibilities as CCO of Client 1st and Client 1st, Ms Morgan has been active in a other outside activities. She was a member of the Board of Directors and President of the Suncoast Tarpon Roundup, Inc. Vicki was a member of the Greater Belleair Younger Women's Society. She is a

member of the Belleair Rotary Club serving on the Board from 2009 until 2012. She was Rotarian of the Year in 2009 and 2011 and was club President for the 2010 to 2011.

DISCIPLINARY INFORMATION---None

ADDITIONAL COMPENSATION –None

SUPERVISION

Ms. Morgan is supervised by Craig Phillips, CEO, and a managing member of Client 1st. Mr. Phillips may be reached at 727-450-2301 ext 108 or craig@c1ag.com.

Mr. Phillips supervises the activities of Ms. Morgan's work through a number of supervisory activities that may include but not be limited to the following:

- Through frequent office and remote interactions
- Through our client relationship management system.
- Review of personal account transactions

JULIE TALBOT

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Julie Talbot was born in 1964. In 1986, she earned a Bachelor of Science degree from the University of Southern Mississippi in Finance, with an emphasis in Accounting. Ms. Talbot began her career in banking as a lender with Trustmark National Bank, in Jackson, Mississippi. When Trustmark launched their full service broker-dealer subsidiary, TFSI, Ms. Talbot was a Registered Representative with this new entity.

In 1996, Ms. Talbot joined Raymond James Financial as an Advisor. It was in this capacity that she was able to establish a third party brokerage arrangement with a community bank, Lamar Bank. Ms. Talbot also served as Secretary/Treasurer and as Administrator in a family medical practice.

In 2012, Ms. Talbot joined Wealth Management Consultants, Inc. as a Retirement Plan Consultant.

DISCIPLINARY INFORMATION--None

OTHER BUSINESS ACTIVITIES

Ms. Talbot is involved in the following additional activities: Treasurer-Oak Grove Middle School PTO; Lamar County Education Foundation-Board Member; University of Southern Mississippi Partner for the Arts-Board Member.

SUPERVISION

Ms. Talbot is supervised by Michelle Mabry, President and a managing member of Client 1st. Ms. Mabry may be reached at 601-264-0946 or michelle@c1ag.com

Ms Mabry supervises the activities of Ms. Talbot's work through a number of supervisory activities that may include but not be limited to the following:

- Through frequent office and remote interactions
- Review of personal account transactions
- Through our client relationship management system.

HERBERT PONTZER

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Herbert Pontzer was born in 1952. After high school, he earned a Bachelor's Degree in Government from Georgetown University in 1974 and an MBA in Finance from The American University in 1978. Herb was employed with the NASD (n.k.a. FINRA) from 1982 until 1997. He was Vice President and Chief Compliance Officer for InterSecurities, Inc., a subsidiary of Western Reserve Life (n.k.a. TransAmerica Advisors, Inc.) from 1997 until 2003 and Senior Vice President and Chief Compliance Officer for NFP Securities, Inc. from 2003 until 2005. Herb has been an IAR of Client 1st Advisors, Inc. since 2005.

Mr. Pontzer has passed six securities license examinations: Series 7, 24, 27, 53, 63 65 and 99 and is currently a registered representative with Ceros Financial Services, Inc. ("Ceros") a registered broker-dealer for the purpose of providing supervision and consulting services. To maintain these registrations Mr. Pontzer completes FINRA continuing education courses every three years and continuing education courses each year for Ceros.

Mr. Pontzer is a Certified Financial Planner (CFP[®]). To obtain this designation, Mr Pontzer completed the financial planning education requirements in nine major planning areas set by the CFP Board and successfully completed the Candidate Fitness Standards and background check. To maintain this designation Mr. Pontzer completes 30 hours of continuing education every two years. Prerequisites for the CFP designation include a Bachelor's degree from an accredited college or university and three years of qualified work experience

Mr. Pontzer is a registered insurance agent with the state of Florida. In addition to passing the insurance licensing examination, Mr. Pontzer is required to complete 24 hours of continuing education every two years.

DISCIPLINARY INFORMATION---None

OTHER BUSINESS ACTIVITIES

Mr Pontzer is a registered representative of Ceros Financial Services, Inc., a registered broker-dealer. Herb is a member of the National Society of Compliance Professionals (NSCP) and the Association of Certified Anti-Money Laundering Specialists (ACAMS).

ADDITIONAL COMPENSATION

Mr. Pontzer receives a salary as President and owner of BD Advisor Consultants, Inc., a company that provides consulting services to financial institutions.

SUPERVISION

Mr. Pontzer is supervised by Craig Phillips, the CEO and a managing member of Client 1st. Mr. Phillips may be reached at 727-450-2301 ext 108 or craig@c1ag.com.

Mr. Phillips or his qualified designee supervises the activities of Mr. Pontzer's work through a number of supervisory activities that may include but not be limited to the following:

- Through frequent office and remote interactions
- Review of personal account transactions