

FIRST CLASS CAPITAL

221 N Jefferson Avenue
Liberty, Mo 64068

Form ADV Part 2A
Client Brochure

This brochure (“Brochure”) provides information about the qualifications and business practices of First Class Capital LLC. (“First Class Capital”), a registered investment adviser. Registration does not imply a certain level of skill or training but only indicates that First Class Capital has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. If you have any questions about the contents of this Brochure, please contact us at (816) 726-5339 or TonyCastelluccio@gmail.com. Additional information about First Class Capital is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2

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Advisory Business

3. General Description of the Firm

First Class Capital is an Investment Advisory firm that manages both Clients Institutional Clients and Individuals. First Class Capital was originated in 2014, and is a privately held company with a sole principal owner of 100% ownership. Additional information about First Class Capital's ownership structure and directors is provided in Schedule A of Part 1A of First Class Capital's Form ADV.

4. Summary of First Class Capital's Advisory Services

First Class Capital asset management advisory specializes in capital accumulation, managing client's wealth through a strategic diversified approach. We like many other wealth managers use the modern portfolio theory to try to maximize return finding what we believe to be the most undervalued securities. But by also building optimally diversified portfolios, through finding securities as perfectly uncorrelated as possible to each other based off the Intra-portfolio Correlation formula, which also provides the ability to take out as much unsystematic risk as possible from the portfolio. We even use alternative options to hedge against potential risks and losses. Such diversification protects from losses in down markets while still allowing much potential for the rise in up markets. This allows great opportunity for potential gains in volatile markets, through rebalancing to capitalize on market swings.

5. Tailored service

First Class Capital try's to tailor its service to the clients needs as best possible, by making each client individual goal's a priority, custom fitting our investment model to achieve them.

6. Fee and Compensation

First Class Capital does Not charge any management fees based off AUM, or charge any fees for reductions, and does Not charge exit fees. Fees will only be charged based on percentage of profits earned (performance-based fee). We recalculate quarterly, charging a 15% of all capital profits earned. Our philosophy is we should Not be paid if we don't do our job of

accumulating capital for our clients. Thus incentivizing us to perform and accumulate more capital for the clients.

First Class Capital may enter into fixed fee, consulting for specific time consulting fee.

First Class Capital may enter into special unique fee structure, if agreed upon by both parties due to client would rather than performance incentive based fee.

In addition all fees paid to First Class Capital are separate from any fees and expenses charged by a third party, transaction fees brokerage fees, custodian fees, ETF fees, mutual fund fees, and whatever third party fees may apply.

First Class Capital does not receive any commission based on third parties used.

7. Managed Assets

First Class Capital has the ability to manage client's assets on a discretionary basis, thus trading without permission of clients. We do not have custody of client's assets, they held within a third party broker's custody.

8. Types of Clients

First Class Capital can provide service for Institutional clients: family offices, pension plans, other Investment advisors, corporations, charitable organizations, Hedge funds, or fund of funds. We will also work with high net worth clients preferably minimum \$1Million in assets, but exceptions are made on individual basis.

9. Methods of Analysis, investment Strategies and Risk of Loss

First Class Capital strives to find undervalued securities by using many different factors from macro economic events, to moves in different sectors, or even individual security news. Taking in all this information we use the Modern Portfolio Theory which helps to quantify a value for the portfolio overall in a way to maximize Portfolio Return. We then take it a step further by not only using random undervalued investments but by making the investments within the portfolios as perfectly uncorrelated as possible with

each other. This allows us to be properly diversified, which is the Most Powerful way of protecting against unsystematic risk. This diversification is not just your standard ratio of separately weighted asset classes, it is calculated through sophisticated software. The software takes into account many different factors but its main focal point is portfolio diversification, which derived from the Intra-Portfolio Correlation formula, giving us the ability to Quantify the diversification level, which helps to understand how the entire portfolio correlates to itself and can be optimized. We also protect against risk of loss through the use of alternative options. This way through taking out a large portion of unsystematic risk and even against systemic risk as well, it helps to protect against loss, and creates an opportunity that helps to separate ourselves from our competition in volatile markets. Thus allowing us to rebalance portfolios and capitalize on gains.

Opposed to only using the traditional standard of measuring risk (standard deviation) which merely calculates a portfolios ability to increase or decrease (volatility). This is what standard investors consider risk, and trying to decrease SD, creating lower volatility hindering their gains. This is where we see volatility in markets can be an opportunity, using it to rebalance and optimize our gains. Thus us not directly always correlating risk to reward, we are able to take less risk of loss, with allowing potential for higher reward.

Diversification if done properly can be very effective. We believe so effective against loss that we have our fee structure set up as a percentage based fee of capital gains performance, not AUM.

In some Strong bull markets Diversification has been known to lag behind benchmarks in some circumstances, but overall if done correctly it is the most efficient and optimal way of investing. Which at First Class Capital we are confident in our ability to perform with this investment philosophy due to the ability to use the most powerful diversification software in the world allowing us to take into consideration information that other investors would most likely otherwise miss. Hence how we have set up our Fee structure, on the incentive to perform.

Risks that may be considered investing are market risks, stock risks, sector risk, cyclical risk, country risk, banking financial system risks, foreign exchange risk, ect. But these risks are common with any form of investing.

10. Disciplinary Information

Like all registered investment advisors, First Class Capital is obligated to disclose any disciplinary event that might be material to any client when evaluating our services.

We do not have any legal, financial, regulatory or other disciplinary items to report to any client. This statement applies to our firm and to all employees of our firm.

11. Other Financial Industry activities

None of the employees are actively affiliated with any other financial industry activities. First Class Capital has no commission incentive with any other financial entity. First Class Capital uses third party custodians to hold investors capital which allow us to manage and make trades.

12. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

First Class Capital's first and foremost puts its ethical, professional, and legal duty to act at all times as a fiduciary to its clients. This means putting the client's interest first even ahead of its own. We will carefully manage away from any conflicts of interest or what is perceived to be of a conflict of interest. We adopted a code of ethics, which is designed to ensure we meet all our fiduciary responsibilities, through compliance to protect and detect against any violations of security fraud.

We abide by the Code of Ethics that is detailed in a statement of policies and procedures which establishes standards of conduct for all employees of First Class Capital, and is consistent with the Code of ethics Rule 204A-1 under the investment adviser's act of 1940 as amended. This includes all fiduciary obligations to clients, applicable securities laws, and specific requirements relating to personal trading, insider trading, conflicts of interest, confidentiality of clients information.

13. Brokerage practices

First Class Capital uses Broker dealers to execute trades for clients as of which we receive no soft dollars or commissions for using one Broker dealer over another. We choose our broker-dealers simply based upon the price charged, trade execution quality, and technology provided to both First Class Capital and our clients. We use brokers live stat information and analytic tool, and research to analyze positions.

Clients will be responsible for charges accrued through which the broker-dealer charges.

14. Review of Accounts

Clients of First Class Capital will receive quarterly account statements, as of which show what their account has done within the last quarter. Also clients will be able to login to their broker-dealer custodian account to see what is happening within the account over the internet, or if not will be able to request a statement. The client will also receive periodic e-mails describing portfolios, and managements views. All accounts are actively managed so we hold our selves responsible to constantly be managing each account, or fund, even if not holding a review with client. Client reviews will be held periodically to not only show performance, but thoughts, and see if client's investment objective has changed.

15. Client Referrals and other compensations

First Class Capital expects for clients to offer referrals from time to time based on their satisfaction. But we do not offer any monetary value to clients due to conflicts of interest. Referrals and driving in new business for us is always appreciated though. All employees must abide by the requirements of rule 206(4)-3 under the Investment Adviser Act of 1940, as amended, to the extent required by applicable law.

16. Custody

First Class Capital does not maintain custody of any Clients funds or security. We provide instructions to use a custodian brokerage corporation regarding client's assets.

Each client will receive account information including trade conformations and quarterly statements directly firm their broker. Only the Brokers trading

conformation and statements representing the official record of Clients account.

17. Investment Discretion

First Class Capital requires that an Account Agreement be completed by a client who decides to First Class Capital as their Registered Investment Advisor. Under terms of agreement First Class Capital assumes full discretionary trading and investing authority over the clients assets held within the Broker. This means First Class Capital has the full authority under power of attorney arrangement to select the timing, size, and identity of securities to buy and sell for the clients.

18. Voting Client Securities

First Class Capital, as a matter of policy and as a fiduciary to our clients, we have the responsibility for voting proxies for portfolio securities consistent with the best economic interests of our clients. Our firm maintains written policies and procedures as to the handling, research, voting and reporting of proxy voting and practices includes the responsibility to monitor corporate actions and vote in the best interest of our clients. All our voting rights are in correspondence with SEC rule 206(4)-6.

19. Financial Information

This Item is not applicable because First Class Capital does not require or solicit the prepayment of any advisory fees, and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our clients.

FIRST CLASS CAPITAL

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Form ADV Part 2B Client Brochure Supplement

October 6, 2014

This brochure supplement provides information about First Class Capital employees that supplements the First Class Capital brochure. You should have received a copy of that brochure. Please contact First Class Capital at (816) 726-5339 if you did not receive First Class Capital's brochure or if you have any questions about the contents of this supplement. Additional information about Anthony Castelluccio is available on the SEC's website at www.adviserinfo.sec.gov

Anthony Castelluccio

Principal executive officer is Anthony Castelluccio. Mr. Castelluccio is the Chief Investment Officer.

Background

Mr. Castelluccio graduated with a Bachelors degree with an emphasis in Economics, Finance and Banking from the University of Missouri. He has been managing money in Kansas City since Graduating. He has also been involved as a financial officer in small growing business.

Disciplinary Information

None

Other Business Activities

None

Additional Compensation

None

Supervision

As CIO Mr. Castelluccio is self regulated

Requirements for State Registered adviser

Never found guilty of any illegal acts

Never Declared Bankruptcy