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*This Brochure provides information about the qualifications and business practices of Client 1st Advisory Group LLC ("Client 1st"). If you have any questions about the contents of this Brochure, please contact us at 727-450-2301 or by email at: [info@clag.com](mailto:info@clag.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 [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).*

*References to Client 1st as a "registered investment advisor" or any reference to being "registered" does not imply a certain level of skill or training.*

## **Item 2 — Summary of Material Changes**

This section discusses only specific material changes that are made to this Form ADV Part 2A (the “Brochure”) and provides you with a summary of such changes. Since March 26, 2021 when we filed our last annual update to our Brochure, we have the following material change to report:

On May 1, 2021, Herb Pontzer assumed the position of Chief Compliance Officer of Client 1<sup>st</sup>. Mr. Pontzer succeeds Dave Stieh who is the Firm’s Chief Operations Officer and a Managing Member of Client 1<sup>st</sup>.

In July 2021 Client 1<sup>st</sup> entered into an agreement with Pontera, a portfolio management platform to facilitate our management of held away assets such as defined contribution plans (See Item 14, page 18)

In March 2022 Client 1<sup>st</sup> joined the Schwab Advisor Network (SAN Program). The Program helps investors to find independent investment advisors. (See Item 14, page 16)

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## **Item 4 — Investment Advisory Business**

In this brochure, references to “we”, “us”, “our”, “our firm”, “the firm” “the Company” and “Client 1<sup>st</sup>” 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 1<sup>st</sup> Advisory Group, LLC was formed under the laws of the State of Florida in March 2013 as the successor to Client 1<sup>st</sup> Advisors, Inc. and Wealth Management Consultants, Inc. The firm is registered with the United States Securities and Exchange Commission as an investment advisor.

Our Managing Members are Michelle Mabry , Chief Executive Officer, Craig Phillips, President and Co-Founder and and Dave Stieh, Director of Operations..

Client 1st offers personalized investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and corporations. Our 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 1<sup>st</sup> 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 an investment management strategy (or “Investment Plan”) that forms the basis of the asset allocation model that we will use to manage your investments. The Investment Plan 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 Investment Plan can also be revisited on demand when a material change in your financial situation occurs.

Based on the Investment Plan that we prepare for you, the Client 1<sup>st</sup> Portfolio Management Team (“Portfolio Team”) creates a portfolio consisting of investments that meet the goals and objectives identified in your Investment Plan. We select a combination of investment vehicles that may consist of ETFs (exchange traded funds), mutual funds, stocks, bonds, alternative investments and commodities. Our selection of these investments is based on extensive research of the performance and risk associated with each investment vehicle.

Our Firm minimum account size for investment management is \$250,000 of assets under management. Client 1<sup>st</sup> reserves the right to waive the account minimum.

### Client 1<sup>st</sup> Wrap Fee Program

We sponsor a wrap fee program (the “Client 1st Wrap Fee Program” or “Wrap Program”) and we are the portfolio manager of our Wrap Fee Program. In a wrap fee program you typically pay the sponsoring financial services firm a single fee, generally payable on a quarterly basis, to cover all costs in connection with securities transactions in your account and the investment management services.

Your IAR will manage your investments in the Wrap Program according to your Investment Plan on a discretionary basis, deliver ongoing investment advice and monitor your security holdings. Our Wrap Program allows you the ability to pay an asset-based advisory fee that covers all transaction costs within the advisory fee.

*For further information please refer to the Client 1<sup>st</sup> Form ADV Part 2A Appendix I Wrap Fee Program Brochure*

### Retirement Plan Consulting

Through its qualified advisors Client 1<sup>st</sup> offers a fee-for-service consulting program whereby our advisors may offer one-time or ongoing advisory services to qualified retirement plans. Through the Retirement Plan Consulting program, our 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 including:

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

### 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 1<sup>st</sup> 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 1<sup>st</sup> 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 1<sup>st</sup>.

### **ASSETS UNDER MANAGEMENT**

We manage your assets on either a discretionary or non-discretionary basis. As of December 31, 2021, we had total assets under management of \$285,308,940 of which \$280,366,940 in client assets were managed on a discretionary basis and \$4,942,000 were managed on a non-discretionary basis.

## **Item 5 — Fees and Compensation**

### **INVESTMENT MANAGEMENT FEES**

#### **Advisor Fees**

Our fee is billed quarterly in advance. The quarterly fee is the annual fee percentage adjusted for the number of days in the calendar quarter and is based on the market value of the account on the last business day of the preceding calendar quarter. 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.

Additions of funds or investments exceeding \$50,000 deposited to your accounts during a quarter will be subject to a pro-rated annual management fee. Liquidations and distributions occurring during the quarter will not receive pro-rated refunds of fees.

Our advisory fee ranges up to 1.50% and is based on the aggregate value of related accounts, the complexity of 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 our advisory fee from your account.

#### **Other Fees and Expenses**

In certain circumstances where our clients will benefit from broader diversification or lower overall expenses we will purchase investments and you will incur nominal transaction fees with executing broker/dealers. These transaction fees and the fees charged by the custodian for maintaining your assets are separate and in addition to the advisory fee.

We charge an additional management fee ranging from .50% to .75% is charged for direct management of held away assets such as 401(k) plans.

Moreover, if our Portfolio Team is investing your assets 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.

#### **FINANCIAL PLANNING AND CONSULTING FEES**

The Client 1<sup>st</sup> 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 1<sup>st</sup> IARs 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 1<sup>st</sup>.

#### **TERMINATION OF AGREEMENTS**

You may terminate any Investment Advisory Agreement or Financial Planning Agreement by notifying Client 1<sup>st</sup> in writing.

For Investment Management Agreements you may terminate the Agreement for any reason within five (5) days of the initial contract date and receive a total refund of your fees. After the initial five days 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 calendar quarter . Any unused portion of the quarterly advanced fee will not be refunded.

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 1<sup>st</sup> 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 1<sup>st</sup> may also terminate the above-referenced agreements by written notification if pertinent information to the planning process has not been provided. In this instance, any unused portion of advanced fees will be refunded within 15 days.

#### **Item 6 — Performance-Based Fees and Side-By-Side Management**

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

#### **Item 7 — 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. 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, our principals and representatives. Client 1<sup>st</sup> reserves the right to waive the account minimum. There is no minimum asset size for our fee-based financial planning services.

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

Generally speaking our goal at Client 1<sup>st</sup> 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**

Our Portfolio Team determines 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 for the existing investment asset classes. We also utilize other information sources both public and purchased including financial publications, prospectuses and annual reports.

## **INVESTMENT STRATEGIES**

Your portfolio of investment assets is a customized allocation strategy based on your means, goals, objectives and risk tolerance and 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” including Real Estate Investment Trusts (“REIT’s”), high yield and structured notes, limited partnerships, master limited partnerships (“MLP’s”) commodities and managed futures.

We use a passive asset allocation process based on the following core strategies that we periodically rebalance back to their original allocations:

### *Conservative*

An income-oriented strategy that seeks current income with minimal risk to principal with only modest long-term growth of principal and has a short- to mid-range investment time horizon

### *Balanced*

A balanced-oriented strategy that seeks to reduce potential volatility by including income-generating investments in the portfolio with moderate growth of principal, short-term price fluctuations, and has a mid- to long-range investment time horizon

### *Growth*

A growth-oriented strategy that seeks to maximize the long-term potential for growth of principal with potentially moderate short-term price fluctuations, a long-term investment time horizon and generating current income is not a primary goal.

### *Aggressive Growth*

A growth-oriented strategy that seeks to maximize the long-term potential for growth of principal with potentially large short-term price fluctuations, a long-term investment time horizon and generating current income is not a primary goal.

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 for you. You will also be provided with quarterly reports of your portfolio's performance from the custodian (either electronically or by mail).

## **RISK OF LOSS**

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

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 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. 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.

## **Item 9 — 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.

## **Item 10 — Other Financial Industry Activities and Affiliations**

Occasionally we enter into solicitor agreements with accounting firms, and other professional firms or individuals who have referred friends and associates to our Firm. Under these agreements the solicitor is compensated for their referral by sharing the annual management fee earned by Client 1<sup>st</sup>. 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 an ongoing 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. Outside solicitor arrangements create a potential conflict of interest. Solicitors may have an incentive to recommend clients to us based on the referral fee.

Compensation or future benefits that we or other network participants receive from referrals creates conflicts of interests and you should carefully consider 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 1<sup>st</sup>. The additional compensation creates conflicts of interest that you should consider before engaging our services.

## **Item 11 — 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 of Ethics by contacting our Main Office at 727-450-2301 or by email at: [info@clag.com](mailto:info@clag.com).

### **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 Assistant Operations Manager reviews all employee statements 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 Chief Compliance Officer is advised.

## **Item 12 — 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 consider in selecting our brokerage and custodial services include:

- Range of securities offered: stocks, bonds, mutual funds, ETFs, alt investments
- Low transaction costs
- Access to client data
- Monthly/ quarterly reports to clients
- Capability of supporting 3<sup>rd</sup> 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 TD Ameritrade Institutional, a division of TD Ameritrade, Inc., member FINRA/SIPC (“TD Ameritrade”). TD Ameritrade is not affiliated with Client 1st. We participate in the institutional advisor program (the “Program”) offered by TD Ameritrade. We receive some benefits from TD Ameritrade through our participation in the Program that are described below under “Item 14—Client Referrals and Other Compensation”.

### **BEST EXECUTION AND TRADING FEES**

In placing orders to purchase and sell securities, our Firm considers a number of factors, not solely the ability to receive the best price, in selecting appropriate broker-dealers. We consider, among other factors, financial condition, reputation, level of trading expertise and capability, infrastructure, alternative trading options resulting from technology developments, market changes and commission rates charged. We typically rely on the brokerage services of our custodian. Occasionally, for fixed income security transactions, we employ third party firms to assist us in seeking best execution. On a periodic basis we review reports on execution quality that are available from our selected broker/dealers. We do not receive any portion of the trading fees charged by the broker-dealers.

### **AGGREGATION OF ORDERS**

We will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple clients’

accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows us to execute equity trades in a more timely and equitable manner, and may result in better pricing to clients.. Trades for associated persons of Firm may be included in client block trades.

#### **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 either as a matter of course or in consideration for using their brokerage services.

#### **Item 13 — 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, asset allocations and the likelihood that the performance of each security or investment strategy will contribute or continue to contribute to your investment objectives. In some cases we prepare reports of portfolio performance when requested by our clients for periodic reviews.

#### **Item 14 — Client Referrals and Other Compensation**

Occasionally we enter into solicitor agreements with accounting firms, and other professional firms or individuals who have referred friends and associates to our Firm. Under these agreements the solicitor is compensated for their referral by sharing the annual management fee earned by Client 1<sup>st</sup>. 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 an ongoing 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. Outside solicitor arrangements create a potential conflict of interest. Solicitors may have an incentive to recommend clients to us based on the referral fee.

### *Schwab Advisor Network*

Client 1<sup>st</sup> receives client referrals from Charles Schwab & Co., Inc. ("Schwab") through our participation in the Schwab Advisor Network® ("the Service" or "SAN Program"). Schwab designed the Service to help investors find an independent investment advisor. Schwab is a broker-dealer independent of, and unaffiliated with Client 1<sup>st</sup>. Schwab does not supervise us and has no responsibility for our management of clients' portfolios or other advice or services we provide. Client 1<sup>st</sup> pays Schwab fees to receive client referrals through the Service. Our participation in the Service raises conflicts of interest, as described below.

Client 1<sup>st</sup> pays Schwab a Participation Fee on all referred clients' accounts custodied at Schwab and a Non-Schwab Custody Fee on all accounts maintained at, or transferred to, another custodian. The Participation Fee we pay is a percentage of the fees the client pays to us, or a percentage of the value of the assets in the client's account subject to a minimum Participation Fee. Client 1<sup>st</sup> pays Schwab the Participation Fee as long as the referred client's account remains in custody at Schwab. Schwab bills us the Participation Fee quarterly and Schwab may increase, decrease, or waive the fee from time to time. Client 1<sup>st</sup> pays the Participation Fee and not the client. We have agreed not to charge clients referred through the Service fees or costs greater than the fees or costs we normally charge to clients with similar portfolios who were not referred through the Service.

Schwab bases the Participation Fee and Non-Schwab Custody Fee on assets in accounts of our clients referred by Schwab and those referred clients' family members living in the same household. This means that we have incentive to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit our fees directly from their accounts.

### *TD Ameritrade Institutional*

As disclosed above under "Item 12--Brokerage Practices" we utilize TD Ameritrade's institutional customer program (the "Program") as our primary brokerage and custodial service provider. Although, there is no direct link between our use of this service provider 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 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 and to certain institutional money managers and discounts on compliance, marketing, technology, and practice management products or services provided to our Firm by third party vendors without cost or at a discount. While these products and services may assist us in managing and administering our Client accounts, some of the products and services that we receive from our participation in the Program may benefit us but may not benefit our Client accounts. The benefits that our Firm or personnel receive through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. 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 indirectly influence our choice of T.D. Ameritrade, Inc. for custody and brokerage services.

Client 1st may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, Our Firm may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with Client 1st and there is no employee or agency relationship between our Firm and TD Ameritrade. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise Client 1st and has no responsibility for our Firm's management of client portfolios or other advice or services. We pay TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to Advisor ("Solicitation Fee"). We will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by Advisor from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and who has hired our Firm on the recommendation of such referred client. We do not charge clients referred through AdvisorDirect any fees or costs higher than the standard fee schedule offered to our clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. (For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.)

Our participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, we may have an incentive to recommend to clients that their assets under management by Client 1st be held in custody with

TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, we have agreed not to solicit clients referred to us through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Our participation in AdvisorDirect does not diminish our duty to seek best execution of trades for our clients' accounts.

### *Pontera (formerly FeeX) – Participant Account Management*

We use a third party platform, Ponterra (f.k.a. FeeX) to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link is provided to our Client allowing he or she to connect an account(s) to the platform. Once Client's account(s) is connected to the platform, we manage the account on a discretionary basis. We review the current account allocations. When deemed necessary, we will rebalance the account considering client investment goals and risk tolerance. Any change in allocations considers current economic and market trends. Client account(s) are reviewed at least quarterly and allocation changes are made as deemed necessary

## **tem 15 — Custody**

Assets are held at our qualified custodian, TD Ameritrade. The custodian provides account statements directly to you at your address of record at least quarterly. Client 1st does not take custody of Clients' securities ( See "Item 12—Brokerage Practices" above)

In very limited circumstances we act as a trustee for clients. Or we may also provide bill paying services where we directly debit your account to pay your service providers. In these service relationships we are deemed to have constructive custody of your funds under federal and state regulations. We establish these relationships with Compliance Department approval and we undergo an annual surprise audit by an accountant designated by the Public Company Accounting Oversight Board (PCAOB).

We urge you to compare the account statements received directly by mail or electronically from your custodian with any performance report statements or services provided to you by Client 1<sup>st</sup> in the course of our relationship.

### **Item 16 — Investment Discretion**

You designate Client 1<sup>st</sup> as your agent and attorney-in-fact to determine appropriate Account investments based on your financial circumstances and investment objectives. Our advisor can accordingly purchase and sell investment assets for your account. . This “trading discretion” granted to Client 1<sup>st</sup> does not authorize us 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.

### **Item 17 — Voting Client Securities**

If you elect to grant Client 1<sup>st</sup> the authority to receive and vote securities on your behalf (“proxies”), we will instruct your custodian to forward copies of all proxies and shareholder communications relating to the securities to Proxytrust, the agent we have retained for voting proxies located at 100 Patco Court, Suite 9, Islandia, NY 11749. Proxytrust will vote your securities in accordance with the guidelines we have established for voting client securities. You may request a copy of our Proxy Voting Guidelines by contacting our Main Office at 727-450-2301 or by email at: [info@clag.com](mailto:info@clag.com).

### **Item 18 — 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.

## **ADV Part 2B : Brochure Supplement**

**611 Druid Road E., Suite 707  
Clearwater, FL 33756**

**(727) 450-2301**

**[www.clag.com](http://www.clag.com)**

**February 2022**

**The following brochure supplement provides information about the Investment Advisory Representatives of Client 1<sup>st</sup> Advisory Group, LLC (“Client 1<sup>st</sup>” or the “Firm”). It supplements the Firm’s Form ADV Part 2A (the “Brochure”). . Please contact David Stieh at 727-450-2301 if you did not receive the Brochure or if you have any questions about the contents of this supplement:**

**Additional information about any of our registered employees is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

# **CRAIG PHILLIPS**

## **CLIENT 1<sup>ST</sup> ADVISORY GROUP LLC**

**611 Druid Road East  
Suite 707  
Clearwater, FL 33756**

**Phone: (727) 450-2301  
Fax: (727) 450-2302**

**Email: [info@c1ag.com](mailto:info@c1ag.com)**

**February 2022**

**This Brochure Supplement provides information about Mr. Phillips that supplements the Client 1<sup>st</sup> Advisory Group, LLC Brochure (the “Brochure”). You should have received a copy of the Brochure. Please contact David Stieh at (727) 450-2301 you did not receive the Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Mr. Phillips is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

Craig Phillips was born in March 1950. After high school, he earned a Bachelors 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 the Co-Founder, Managing Partner and current President and Co-Founder of Client 1st Advisory Group, 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 successfully completed the financial planning education requirements in nine major planning areas set by the CFP® Board, the Candidate Fitness Standards background check and the CFP examination. 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 a Certified Financial Transitionist (CeFT®). To obtain the CeFT® designation, Mr. Phillips had to have earned the CFP designation, undergo a Core Training program and complete a proctored written and oral certification examination. To maintain this designation, Mr. Phillips is required to complete fifteen hours of continuing education credits each year and attend mid-year workshops or annual conferences once every two years

Mr. Phillips is an Accredited Investment Fiduciary (AIF®). To obtain the AIF® designation, he 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.

### **Item 3 – Disciplinary Information**

None

### **Item 4 – Other Business Activities**

In addition to his responsibilities as Managing Partner and President 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 Living, Inc., a non-profit community mental health provider. He is past Treasurer and currently the Florida Governor Appointed Chairman of the Board of Directors of the Early Learning Coalition of Pinellas County. He is former Chairman of the Humane Society of Pinellas' Foundation Board and is a board member and past Chairman of the Board of Directors of the Clearwater Free Clinic. He is the former President of the Board of Directors of Belleair Country Club

### **Item 5 – Additional Compensation**

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

### **Item 6 – Supervision**

Mr. Phillips is supervised by Michelle Mabry, CEO and a Managing Principal of Client 1<sup>st</sup>. Ms. Mabry may be reached at 601-264-0946 or [Michelle@c1ag.com](mailto:Michelle@c1ag.com).

Mrs. Mabry supervises the activities of Mr. Phillips 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 visits and remote interactions
- Through our client relationship management system.

# **MICHELLE MABRY**

## **CLIENT 1<sup>ST</sup> ADVISORY GROUP LLC**

5266 Old Hwy 11  
Suite 50 PMB 353  
Hattiesburg, MS 39402

Phone: (601) 264-0946  
Fax: (601) 264-0949

Email: [michelle@c1ag.com](mailto:michelle@c1ag.com)

February 2022

**This Brochure Supplement provides information about MS. Mabry that supplements the Client 1<sup>st</sup> Advisory Group, LLC Brochure (the “Brochure”). You should have received a copy of the Brochure. Please contact David Stieh at (727) 450-2301 you did not receive the Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Ms. Mabry is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 -- 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, which merged into Client First Advisory Group, Inc. in 2013. She is a Investment Advisor Representative and is CEO and Chief Investment Officer at Client 1<sup>st</sup>

Mrs. 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.

Mrs. 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 Mrs. 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.

## **Item 3 – Disciplinary Information**

Michelle Mabry does not have any material disciplinary history

## **Item 4 – Other Business Activities**

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

Wealth Management Consultants Corporation—Sole owner  
Pinebelt Community Foundation –Board member, Investment Committee  
St. Fabian Catholic Church—Chairman of Finance Committee  
St. Maarten Homeowners Association—Treasurer

## **Item 5 – Additional Compensation\**

None

## **Item 6 – Supervision**

Mrs. Mabry is supervised by Craig Phillips, President and a Managing Member of Client 1<sup>st</sup>. Mr. Phillips may be reached at 727-450-2301 ext 108 or [craig@c1ag.com](mailto:craig@c1ag.com).

Mr. Phillips supervises the activities of Ms Mabry 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
- Through our client relationship management system.

# **DAVID STIEH**

## **CLIENT 1<sup>ST</sup> ADVISORY GROUP LLC**

**611 Druid Road East  
Suite 707  
Clearwater, FL 33756**

**Phone: (727) 450-2301  
Fax: (727) 450-2302**

**Email: Dave@c1ag.com**

**February 2022**

**This Brochure Supplement provides information about Mr. Stieh that supplements the Client 1<sup>st</sup> Advisory Group, LLC Brochure (the “Brochure”). You should have received a copy of the Brochure. Please contact David Stieh at (727) 450-2301 you did not receive the Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Mr. Stieh is available on the SEC’s website at  
[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 -- 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 1998. 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 preparer with H&R Block. In 2006, Dave joined Client 1<sup>st</sup> Advisors, Inc. as the Operations Manager and as an Investment Advisor Representative. Mr Stieh is currently Chief Operations Officer (COO) and a part owner of Client 1<sup>st</sup> Advisors, Inc.

Mr. Stieh is a Certified Financial Planner (CFP®). To obtain this designation, Mr. Stieh 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 Mr. Stieh completes 30 hours of continuing education every two years. 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.

## **Item 3 – Disciplinary Information**

None

## **Item 4 – Other Business Activities**

None

## **Item 5 – Additional Compensation**

None

## **Item 6 – Supervision**

Mr. Stieh is supervised by Craig Phillips, President and a Managing Principal of Client 1st. Mr. Phillips may be reached at 727-450-2301 ext 108 or [craig@c1ag.com](mailto: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
- 
- Through our client relationship management system.

# **MORGAN MABRY**

## **CLIENT 1<sup>ST</sup> ADVISORY GROUP LLC**

611 Druid Road East  
Suite 707  
Clearwater, FL 33756

Phone: (727) 450-2301  
Fax: (727) 450-2302

Email: [Morgan@c1ag.com](mailto:Morgan@c1ag.com)

**February 2022**

**This Brochure Supplement provides information about Ms. Mabry that supplements the Client 1<sup>st</sup> Advisory Group, LLC Brochure (the “Brochure”). You should have received a copy of the Brochure. Please contact David Stieh at (727) 450-2301 you did not receive the Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Ms. Mabry is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

Morgan Mabry was born in April 1993. After high school, she earned two Bachelor's Degrees in Economics and Interdisciplinary Studies with a focus in Mandarin Chinese and Business from the University of Mississippi in 2015. Ms. Mabry has been employed with Client 1<sup>st</sup> Advisory Group since 2013 on a part-time basis as an Assistant Operations Manager. In 2016 she began working for the Firm on a full time basis before beginning the transition into an advisory role.

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 Morgan completes 30 hours of continuing education every two years.

## **Item 3 – Disciplinary Information**

None

## **Item 4 – Other Business Activities**

None

## **Item 5 – Additional Compensation**

None

## **Item 6 – Supervision**

Ms. Mabry is supervised by David Stieh, COO and a Managing Member of Client 1st . Mr. Stieh may be reached at 727-450-2301 ext 107 or [Dave@clag.com](mailto:Dave@clag.com). Mr. Stieh supervises the activities of Ms Mabry 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
- Through our client relationship management system.

# **SHARON BASTIDE**

## **CLIENT 1<sup>ST</sup> ADVISORY GROUP LLC**

**4445 Hwy A1A, Suite 239  
Vero Beach, FL 32963**

**Phone: (772) 231-3122**

**Email: Sharon@c1ag.com**

**February 2022**

**This Brochure Supplement provides information about Ms. Bastide that supplements the Client 1<sup>st</sup> Advisory Group, LLC Brochure (the “Brochure”). You should have received a copy of the Brochure. Please contact David Stieh at (727) 450-2301 you did not receive the Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Ms. Bastide is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

Sharon Bastide was born in February, 1953. She earned a Bachelor of Science degree in Business Administration with majors in Economics and Finance from Duquesne University in Pittsburgh, PA.

Sharon began her career in 1976 at Merrill Lynch as a Financial Advisor. Her tenure with Merrill Lynch continued until 2002 as a Vice President and Manager in Corporate Debt Finance and Trading in New York City. This included institutional trading in money market instruments and short-term corporate debt. Sharon also served as a Vice President and Manager in the Merrill Lynch Retirement Group focusing on retirement plan solutions for institutions and plan participants. Since 2002 she has continued as a Retirement Plan Consultant with Diversified Investment Advisors n.k.a. Transamerica Retirement Solutions until 2016.

Sharon holds a Series 65 License, Investment Advisor Representative and has held several industry designations over her career including the General Securities and Principal Supervisory licenses. Sharon joined Client 1st Advisory Group in April of 2018 in the Vero Beach Office.

## **Item 3 – Disciplinary Information**

None

## **Item 4 – Other Business Activities**

None

## **Item 5 – Additional Compensation**

None

## **Item 6 – Supervision**

Ms. Bastide is supervised by Craig Phillips, President and Managing Partner of Client 1st Advisory Group. Mr. Phillips may be reached at (727) 450-2301 or [craig@clag.com](mailto:craig@clag.com).

Mr. Phillips, or his qualified designee, supervises Ms. Bastide's work through a number of supervisory activities that may include, but not be limited to, reviewing new accounts applications, client profiles and investment strategies, , periodic audits of the office location and through the Firm's client relationship management system.