

First Growth Capital, LLC

Client Relationship Summary (“CRS”)

I. Introduction.

First Growth Capital, LLC (“First Growth Capital”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Clients and prospective clients should be aware that services and fees differ between investment advisers and broker-dealers and it is important for retail investors to understand the differences. Free tools are available to research advisory firms at www.investor.gov, which also provides educational materials about broker-dealers, investment advisers and investing.

II. What investment services and advice can you provide me?

Services: First Growth Capital offers portfolio management and advisory services focused on an array of equity strategies, derivative strategies, asset allocation strategies, balanced strategies, alternative and sector strategies. Our services are offered primarily the account you maintain with your broker-dealer, bank, investment advisory firm or other financial institution (“your Financial Institution”). First Growth Capital does not custody or take possession of your assets. First Growth Capital also offers services directly to clients.

First Growth Capital offers its services on either a “discretionary” or a “non-discretionary” basis. In a discretionary account (typically referred to as a separately managed account), at the outset of the contractual relationship, First Growth Capital is granted the authority by you to determine the securities or other assets to purchase or sell in the account. This discretion will remain in effect unless revoked by you or your Financial Advisor. First Growth Capital will monitor your separately managed account and will purchase and sell securities and other assets in the account consistent with the investment strategy or strategies selected by you (or your Financial Advisor on your behalf) as part of your overall investment plan (subject to any reasonable restrictions provided in writing to First Growth Capital).

In a non-discretionary account, First Growth Capital makes recommendations to you, your Financial Advisor or Financial Institution concerning securities and other assets, but First Growth Capital does not have the authority to implement such recommendations. Accordingly, First Growth Capital is not involved in the selection of the Financial Institutions through which transactions are implemented. Rather, you (or your Financial Advisor or Financial Institution on your behalf) have the sole authority to determine whether securities or other assets in your account are purchased or sold in accordance with First Growth Capital recommendations. Non-discretionary accounts also include those for which First Growth Capital supervises the securities or other assets in the account, without any discretionary authority.

Requirements to open and maintain an account: First Growth Capital generally requires discretionary separately managed accounts to have a minimum account value of \$500,000 for individuals and institutional accounts to have a minimum account value of \$1.5 million.

Additional Information: Additional information on relationships, fees and services can be found in the First Growth Capital Form ADV, Part 2A (items 4-7) which is available on the SEC’s Advisor Information website <https://adviserinfo.sec.gov/firm/summary/305958>

Conversation starters:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications?

What do these qualifications mean?

III. What fees will I pay?

Principal Fees and Costs: First Growth Capital fees for discretionary accounts are based on a percentage of the value of the assets in your separately managed account for which we are providing services, and the specific percentage amount is based upon the investment strategy selected and the amount of assets in your separately managed account.

First Growth Capital fees for non-discretionary model portfolio recommendations are based on a percentage of the value of the overall assets at the Financial Institution with respect to which our recommendations are made. A general fee schedule for discretionary investment management services is included in the First Growth Capital Form ADV 2A (Item 5). The actual percentage amount you pay may be lower than that shown on the schedule, depending on the arrangements with your Financial Institution and Financial Advisor. You can obtain the specific fee that you pay from your Financial Advisor. First Growth Capital retains full authority to negotiate the fees it charges for discretionary and non-discretionary advisory services. First Growth Capital fees are generally payable quarterly in advance, but certain accounts may be billed in arrears.

First Growth Capital's fees are exclusive of brokerage commissions, transaction fees, custodial fees, deferred sales charges, exchange fees, SEC fees, transfer taxes, wire transfer, electronic fund fees, and other related costs and expenses which are incurred by the client from custodians, brokers, third-party advisor and other third parties.

Additional Information: Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Additional information can be found in the First Growth Capital Form ADV, Part 2A (Items 5-6) which is available on the SEC's Advisor Information website.

Fees related to the investment in our private fund are included within the Private Placement Memorandum. Private fund investments is limited exclusively to qualified investors.

Conversation starters:

Help me understand how these fees and costs might affect my investment. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?

IV. What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When First Growth Capital acts as your investment adviser, we are required to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. For example, for those discretionary accounts for which we also have discretion to select broker-dealers to execute transactions, Form ADV, Part 2A (Item 12 – Brokerage Practices (Research and Other Soft Dollar/Commission Sharing Benefits) describes the conflict of interest we have with respect to broker-dealers that provide us research and brokerage services. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

First Growth Capital has adopted a Code of Ethics describing its standards of business conduct, potential conflicts of interest and fiduciary duties. Additional information: Additional information on conflicts of interest can be found in our Form ADV, Part 2A (Items 7,8,10,11 and 12) which is on the SEC's Advisor Information Website above.

Conversation starter:

How might your conflicts of interest affect me, and how will you address them?

V. How do your financial professionals make money?

First Growth Capital sales personnel are compensated based on a portion of the fees paid to First Growth Capital for advisory services, creating a conflict in that they have an incentive to recommend higher fee-generating products. Other First Growth Capital personnel are compensated based on individual performance and growth of the business.

VI. Do you or your financial professionals have legal or disciplinary history?

No. First Growth Capital has not been subject to any disciplinary event by regulators nor is it a party to any legal event that are material to client evaluation of our advisory business. You can visit www.investor.gov for free and simple search tools to research us and our financial professionals.

Conversation starter:

As a financial professional, do you have any disciplinary history? For what type of conduct?

VII. Additional Information.

For additional information about our services or to request a copy of this relationship summary or our Form ADV Brochure, please visit the SEC's website at www.adviserinfo.sec.gov, or telephone us at 202-656-9723.