



# Wrap Fee Program Brochure

(Form ADV Part 2A, Appendix 1)

## First Boulevard Advisors, LLC

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### Item 1: Cover Page

This Wrap Fee Program Brochure provides information about the qualifications and business practices of First Boulevard Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at [support@1stblvd.com](mailto:support@1stblvd.com). 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.

Additional information about First Boulevard Advisors, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can conduct a Firm search using our CRD No. 315532.

Registration as an investment adviser does not imply a certain level of skill or training.

## Item 2: Material Changes

We initially provide you with a copy of our Wrap Fee Program Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we may choose to provide you with a complete copy of our brochure.

As this is our initial brochure, we have no material changes to report.

You may request a current copy of our Wrap Fee Program Brochure at any time without charge by contacting us at [support@1stblvd.com](mailto:support@1stblvd.com).

You may also obtain a copy of our current Wrap Fee Program Brochure at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can conduct a Firm search using our CRD No. 315532.

## **Item 3: Table of Contents**

Item 1: Cover Page	<b>1</b>
Item 2: Material Changes	<b>2</b>
Item 3: Table of Contents	<b>3</b>
Item 4: Services, Fees, and Compensation	<b>4</b>
Firm Overview	4
Services	4
Fees	6
Item 5: Account Requirements and Types of Clients	<b>7</b>
Item 6: Portfolio Manager Selection and Evaluation	<b>7</b>
Portfolio Manager Selection and Evaluation	7
Performance-Based Fees and Side-By-Side Management	7
Methods of Analysis, Investment Strategies and Risk of Loss	7
Voting Client Securities	9
Item 7: Client Information Provided to Portfolio Managers	<b>9</b>
Item 8: Client Contact with Portfolio Managers	<b>9</b>
Item 9: Additional Information	<b>9</b>
Disciplinary Information	9
Other Financial Industry Activities and Affiliations	9
Code of Ethics, Participation in Client Transactions and Personal Trading	9
Review of Accounts	10
Client Referrals and Other Compensation	10
Financial Information	10

## Item 4: Services, Fees, and Compensation

### Firm Overview

First Boulevard Advisors, LLC (the “Firm”) is a registered investment adviser registered with the United States Securities and Exchange Commission (“SEC”). The Firm was organized as a limited liability company in the State of Delaware in 2021. The Firm is a wholly owned subsidiary of Be Tenth, Inc., a Delaware corporation.

The primary focus of Be Tenth, Inc. and its subsidiaries is to provide education and financial services built for Black America and other underserved communities. Our products and services are designed to help build generational wealth. As Black leaders throughout history have told us, controlling our finances is an effective tool to fight against a history of systemic racism. We are a fully inclusive financial services company.

### Services

Our mission is to help you build your financial wealth by providing you with resources and tools through our mobile application (the “Platform”). We offer informational and educational materials on topics such as developing a budget, reducing debt, building savings, and investing your money to help you reach your financial goals.

The Platform is available to individuals who have an active First Boulevard Deposit Account and First Boulevard Visa Debit Card.<sup>1</sup> The Platform offers an easy way to start building your investment portfolio using “Round Ups.” Each time you make a purchase using your First Boulevard Debit Card, the purchase amount is rounded up to the nearest dollar, which is deducted from your First Boulevard Deposit Account. We accumulate your Round Ups and transfer them to your brokerage account (discussed below) on a weekly basis.

To use the Platform, you need to complete an investor profile questionnaire to help identify your investment objective as Maximum Growth, Moderate Growth, Conservative Growth, or Income. Once your investment objective is identified, you may choose a Portfolio that is composed of (a) individual stocks, (b) exchange-traded funds (ETFs), or (c) a combination of stocks and ETFs.

Our Platform uses an algorithm to provide you with portfolio recommendations based on your investor profile. The accuracy of the portfolio recommendations provided by our algorithm depends on the accuracy of your responses to the questionnaire. If your financial circumstances change, we recommend that you update your responses to the questionnaire. Although we provide guidance in identifying your investment objective, the final portfolio selection is made at your sole discretion.

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<sup>1</sup> The First Boulevard Deposit Account is established by Central Bank of Kansas City, Member FDIC. The First Boulevard Visa Debit Card is issued by Central Bank of Kansas City pursuant to a license from Visa U.S.A. Inc.

We have established a relationship with DriveWealth, LLC, an SEC registered broker-dealer and FINRA member (the "Broker"). You must open a brokerage account with the Broker and provide discretionary trading authority over that account to us. The Broker will provide custody, clearing, and settlement services for your account. All account opening functionalities, including identity verification and approval, are handled digitally by the Broker. The Broker provides all brokerage services to you; therefore, you must agree to the terms of the Broker's "Customer Account Agreement" to establish an account with Broker. Brokerage accounts in our Program are limited to individual accounts held in your name only. You will be required to complete all applicable Broker forms and agreements, including a limited power of attorney, which authorizes us to place trades on your behalf and authorizes the Broker to deduct our fees from your accounts pursuant to your agreements with us. The Broker reserves the right to reject any account application for any reason whatsoever.

You will need to securely link your First Boulevard Deposit Account and First Boulevard Debit Card to the Platform. All transactions that you make using your First Boulevard Debit Card will be monitored by the Platform. You authorize us to facilitate the use of the Automated Clearing House ("ACH") payment system for the transfer of money to or from the Broker. You are responsible for any fees, charges, or expenses in connection with any deposit or transfer of money to or from your brokerage account. You will further be responsible for all fees associated with failed ACH transfers. It is your responsibility to make sure that sufficient funds are available in your account to support your participation in this program.

After the Round Ups have been transferred to your brokerage account, transactions will be initiated to invest your Round Ups in accordance with the portfolio you have selected. Note that if you select a portfolio that includes individual stocks, Round Ups will be used to purchase fractional shares of the individual stocks in the portfolio. You may sell your securities or transfer your securities to another account at any time. Please note, however, that fractional shares are not transferable. Fractional shares must be liquidated prior to transferring your account. You may also withdraw available cash out of your brokerage account at any time. The cash will be transferred back into your First Boulevard Deposit Account. Please note, however, that cash transfers from your brokerage account to your First Boulevard Deposit Account may take up to five (5) business days before funds are available for withdrawal.

By using the Platform, you authorize and direct us to place all trades in your brokerage account through the Broker. We do not accept directed brokerage arrangements. Consequently, we maintain all client accounts and execute all securities transactions without separate commission costs or other fees. In seeking best execution, the determinative factor is not just cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the Broker's services. The appointment of a registered broker-dealer as the sole Broker for your accounts may result in less favorable executions than may be available through the use of a different broker-dealer. We do not receive research or other products or services from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits"). We do not receive client referrals from the Broker.

We place aggregated orders involving multiple client accounts trading in the same securities. Each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order. Trades do not occur in real time as Round Ups occur. Round Ups are accumulated and transferred to the Broker on a weekly basis. Upon receiving the accumulated Round Ups, the Broker initiates transactions for the aggregated orders. After the orders are executed, investments are then allocated to your brokerage account.

We do not maintain custody of client assets. Client assets are maintained in an account with the Broker, a qualified custodian.

Any information provided in our Platform, within our marketing materials, or by our customer service representatives is for informational and general educational purposes only. Any graphs, charts and other visual aids that may be provided are for informational purposes only, not to be used to make investment decisions.

Only publicly-traded securities and ETFs are available through the Platform. We do not provide comprehensive financial planning services and the investment advisory services provided through the Platform are not a complete investment program. We encourage you to consider additional asset classes, strategies and investments to supplement your overall investment plan. You should not use the Platform as the sole component of your investment program.

All advisory services are provided exclusively through the Platform. We do not provide comprehensive financial planning, tax, accounting, or legal advice.

## Fees

Our services are provided as a wrap fee program. Typically, in a wrap fee program, all services are bundled into a single “wrap fee” that includes access to advisory services as well as brokerage, custody, clearance, settlement, and other administrative charges. Although structured as a wrap fee program, we will not charge a fee for the initial launch of our services.

The basic Round Up service with discretionary managed portfolios included in the initial launch is provided at no cost to you. We plan to implement additional premium services on the Platform for a fee in the future. The additional premium services will be optional; users may continue to use the basic services for free.

You should be aware that a wrap fee program may cost more or less than purchasing such services separately. Wrap fee programs are typically more cost-efficient when frequent trades are made in the account.

The wrap fee does not include certain charges imposed by custodians, broker-dealers, and other third parties, such as transfer or wire fees, deferred sales charges, other fees and taxes. You should review all fees charged by funds, custodians, and others to fully understand the total amount of direct and indirect fees you will incur.

## Item 5: Account Requirements and Types of Clients

To use the Platform, you must be a resident of the United States and have a valid social security number or tax identification number. You must complete an investor profile questionnaire, meet the requirements to open a brokerage account with the Broker, and have an active First Boulevard Deposit Account and Debit Card linked to your brokerage account as described above. Currently the program is only available to individuals.

## Item 6: Portfolio Manager Selection and Evaluation

### Portfolio Manager Selection and Evaluation

We do not engage external portfolio managers for the Program.

### Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client. Furthermore, we do not manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee.

### Methods of Analysis, Investment Strategies and Risk of Loss

From the list of investments available through the Broker, we select a curated list of individual stocks and ETFs from which we create portfolios designed to meet certain risk objectives.

***All investments in securities involve the possibility of financial loss, and you should be prepared to bear the loss of any principal amount invested.*** Your brokerage account is subject to various market, volatility, liquidity, investment-specific, and other risks inherent in investing. Investments made through the Platform will not always be profitable, and we cannot guarantee any particular level of investment performance. You should be aware that past performance does not guarantee future results.

In addition to general market risks described above, investments may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber attacks, or network outages. The extent and impact of any such event on investments will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions or mitigations, the effect on the supply chain, overall consumer confidence, and the extent of the description to global and domestic markets.

You should also be aware of the following potential risks:

***Risks of Investing in Securities.*** Security prices can be volatile, and investing in securities involves risk of loss. The price of a security may fluctuate, possibly significantly, in a short period of time. Your account will be subject to general movements in the stock market and the value fluctuations of each particular security. Security prices fluctuate for several reasons, including changes in the financial condition of a particular issuer, investors' perceptions of

the issuer's industry, the general condition of the relevant stock market, changes in interest rates, or when political or economic events affecting the issuers occur.

*Risks of Investing in ETFs.* Shares of an ETF may trade on an exchange at prices at, above, or below their most recent NAV. The NAV represents the value of each share's portion of the ETF's underlying assets and cash at the end of the trading day. The per-share NAV of an ETF is calculated at the end of each business day. The trading prices of an ETF's shares fluctuate continuously throughout the trading day based on market supply and demand, which may not correlate to NAV. The trading prices of an ETF's shares may differ significantly from NAV during periods of market volatility, which may, among other factors, lead to the ETF's shares trading at a premium or discount to NAV. Investment policies, management fees and other information can be found in the individual ETF's prospectus. Please read the prospectus carefully before you invest. *Investors should consider the investment objectives, risks, charges and expenses of each ETF carefully before investing. This and other information are contained in each ETF's prospectus, which may be obtained by visiting the ETF sponsor's website. Please read each prospectus carefully before you invest.*

*Concentration of Investments.* Client accounts in the program will typically hold a relatively small number of securities, which will expose the account to the particular industry or market sector the security represents and the value of the specific company. Losses in one or more positions, or a downturn in an industry or market sector in which the company participates, could adversely affect the account performance in a particular period.

*Long-Term Purchases.* We encourage you to consider your account to be a long-term investment purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term, which may not be the case. There is also the risk that the segment of the market that you are invested in or the particular investment will go down over time even if the overall financial markets advance. Long-term purchases may create an opportunity cost by "locking-up" assets that may be better utilized in the short-term in other investments.

*Fractional Share Trading:* Fractional share trading allows you to purchase securities in dollar amounts rather than share quantities. Trading in fractional shares has unique risks and limitations that you should understand prior to participation in fractional share trading. Fractional shares are not transferable. If you close your account or transfer your account to another firm, the fractional shares held in your account will need to be liquidated. Fractional shares cannot be put into certificate form and mailed. Liquidations of fractional shares may result in additional charges. Trading may be rounded to not more than five decimal places.

*Trading in Real Time:* Trading does not occur in real time. Round Ups are accumulated and transferred to the Broker on a weekly basis. Upon receiving the accumulated Round Ups, the Broker initiates transactions for the aggregated orders. After the orders are executed, investments are then allocated to your brokerage account. Trades are at market price only; we do not allow for limit trades or hard stops. Trading will occur by aggregating orders involving multiple client accounts.



*Reliance on Algorithms:* Our Platform uses proprietary algorithms. We cannot guarantee that the algorithms used will indeed function as intended. The Platform has inherent limitations, including the possibility of human error in the design, data input or implementation process. The risk of errors, malfunctions and anomalies is inherent in each component of the programming process, how those components function together, and how the program absorbs data points provided by you and interpreted by the Platform.

This list of risks may not be a complete explanation of all the risks involved in investing with this program. You should read the entire brochure, client agreement, terms and conditions, and other materials that may be provided by us or within the Platform. You may need to consult with professionals such as tax, accounting, legal, or financial advisers prior to engaging our services.

### **Voting Client Securities**

We do not accept authority to vote on client securities. You should instruct your account custodian to direct all proxies or other solicitations to you. We do not provide information or guidance regarding proxies or solicitations.

## **Item 7: Client Information Provided to Portfolio Managers**

We manage all client accounts directly using our interactive Platform. We do not use external portfolio managers. Your information is shared with the Custodian for purposes of servicing your account.

## **Item 8: Client Contact with Portfolio Managers**

We provide our advisory services exclusively through the Platform. You may contact our customer service during normal business hours for technical assistance or to answer any questions regarding your account.

## **Item 9: Additional Information**

### **Disciplinary Information**

Neither our Firm nor any of our management persons have any legal or disciplinary events to disclose.

### **Other Financial Industry Activities and Affiliations**

Neither the Firm nor any of its management persons are registered, and do not have an application pending for registration, as a broker-dealer, broker-dealer representative, futures commission merchant, commodity pool operator, commodity pool trading adviser, or an associated person of the foregoing entities.

### **Code of Ethics, Participation in Client Transactions and Personal Trading**

We have adopted a written Code of Ethics that describes our fiduciary duty to our clients, outlines professional standards of conduct, and establishes policies for personal securities

activities of employees, and implements procedures designed to mitigate any conflicts of interest. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Our Firm and persons associated with our Firm may buy or sell securities for their personal accounts that are the same as or different from securities recommended to clients. Our policies and procedures prohibit our Firm and associated persons from trading ahead of clients in the same instruments that we buy or sell for client accounts. However, there may be circumstances in which the Firm or its associated persons have holdings in the same securities that we buy or sell on your behalf. Our policy is that neither the Firm nor any of its associated persons are to benefit from price movements that may be caused by transactions for client accounts.

### Review of Accounts

Our personnel monitor the Platform to ensure the proper functioning of its algorithms, but we do not monitor individual client accounts on a regular basis. We may review accounts as necessary to resolve customer support or technical issues, or to investigate potential errors or fraud. We do not provide any regular periodic reviews of your account.

You may view your account at any time in the Platform. Statements are provided by the Broker on a monthly basis. You should review your account statements promptly to confirm the accuracy of the information contained in the statements.

### Client Referrals and Other Compensation

As stated previously, currently our services are provided by capital investors, and are available to users free of charge. We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to clients. We do not compensate directly or indirectly any other person or entity for client referrals, nor do we receive compensation for client referrals.

### Financial Information

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance; therefore, we are not required to provide a balance sheet.

We have not been the subject of a bankruptcy petition at any time during the past ten years, and we do not have any financial circumstances that would impair our ability to meet our contractual responsibilities to our clients.