



FirsTrust, LLC
(d.b.a. FirsTrust)

A Multi-Member, Manager Managed, Florida Limited Liability Company

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Firm Brochure
(Part 2A of Form ADV)

CRD #111800

March 1, 2025

This brochure provides information about the qualifications and business practices of FirsTrust, LLC (“FirsTrust”). If you have any questions about the contents of this brochure, please contact us at: (386) 788-3737 or by email at: info@FinancialTeam.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 FirsTrust is available on the SEC’s website at www.adviserinfo.sec.gov

Please note that no reference to being a “registered investment adviser” or being “registered” implies any certain level of skill, training or expertise. Please read our advisor's biographies for such information.

Item 2: Material Changes since the Last Update (March 2024):

None

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Item 4: Advisory Business

Firm Description

Long before “Fee-Only” became a trendy industry buzzword, being independent of a Wall Street profit agenda and completely objective in our financial advice was still the right thing to do.

FirsTrust (“the Firm”) originated by our Founding Partner, Michael Koenig in 1994 as the FirsTrust Advisory Council; operating as an association of fee-only financial professionals, and thereafter as a Florida investment advisor in 1997.

Our Board of Directors Chairman is Michael Koenig, CFP®, J.M. The firm is managed by President William J. Kearney, Jr. Our Chief Investment Officer and Chief Compliance Officer is Christopher Cannon, CFA. Our Chief Information Security Officer is Melody Koenig, MA, CISM. Our Chief Administrative Officer is Susan Blizzard.

FirsTrust offers an a-la-carte menu of Comprehensive Financial Planning, Trust & Estate Services, and Investment Management with an option to include an additional focus on tax management. These services are delivered by the firm’s Investment Advisor Representatives (“Advisors”) either individually or by forming a collaborative team (“FinancialTeam”) of Advisors with specialized skills.

These services are offered to individuals, businesses, families and their related entities, such as trusts, estates, and family businesses.

Like all registered investment advisors, FirsTrust is held to a fiduciary standard under the Investment Advisers Act of 1940. However, FirsTrust believes sales agendas, obscured disclosures and otherwise avoidable conflicts of interest remain pervasive in the industry. Therefore, we voluntarily employ additional measures to more fully align ourselves with the best interest of our clients:

- To preserve the objectivity of our financial advice, we refuse to accept sales commissions or marketing incentives, and we decline all third-party gifts and sponsorships from financial product and service providers.
- To ensure due care and competence, our Advisors are required to have a college education, at least 15 years of experience, an expert accreditation and a continuing education requirement.
- We maintain client privacy with dedicated Cyber Security personnel and a “no-opt” Privacy Policy that automatically prohibits selling a client’s private information or revealing their identities.
- The firm remains independent from any single financial institution to provide our clients with access to a broader scope of investments across the global landscape of financial institutions.
- We enhance security controls by remaining separated from client funds. Clients’ public securities and cash are held in their own accounts at qualified Custodians such as Charles Schwab and Co., Inc. (“Schwab”). FirsTrust is independent of, and has no affiliation with, Charles Schwab & Co., Inc. or any of its affiliates; nor has Schwab created, supplied, licensed, endorsed, or otherwise sanctioned these materials.

Principal Owners

Michael Koenig, Melody Koenig, KFDT Trust, and Christopher Cannon own 100% of FirsTrust.

Types of Advisory Services

The firm provides Fee-Only financial planning and investment management services, either on a discretionary management basis (where the firm is given the discretion to manage investment accounts pursuant to a written policy) or non-discretionary management basis (where the firm does not unilaterally buy or sell securities in client portfolios) under 3 basic categories:

1. Private Wealth Management: (including discretionary investment management services)

a. Ongoing Investment Management

This service traditionally includes portfolio cost and expense analysis, risk analysis, customized rate-of-return goal benchmarking, asset class selection, asset allocation, and continuous investment management guided by a written Investment Policy Statement and supervised by our Chief Investment Officer. Thereafter, the ongoing management process customarily includes investment research, selection and implementation, periodic rebalancing as needed, and quarterly reporting. Clients may also elect to engage us to employ investment-related tax management strategies, such as on-going tax gain/loss management, cost basis & wash sale rule management and asset location strategies.

b. Comprehensive Wealth Management

This comprehensive financial, tax, estate and retirement planning service traditionally includes an analysis of the annualized rate-of-return most consistent with the client's prioritized financial objectives, cash flow requirements, insurance needs and income tax liability management. As requested, we will provide analysis and recommendations for quarterly income tax deposit requirements, IRA beneficiary designation and distribution planning, and the annual management of Required Minimum Distributions. (Distributions must be specifically requested in advance by the client.)

c. Strategic Tax Planning

This service adds an additional layer of attention and expertise to help clients save money on their overall taxes. Collaboration with a client's CPA or tax preparer requires written pre-authorization.

d. Advanced Estate Planning

This service adds an additional layer of attention and expertise for clients with more complex legacy objectives. Post-mortem assistance is available with client's written pre-authorization.

2. Personal Wealth Management: (non-discretionary: no investment management service)

a. Comprehensive Financial Planning

Under a separate written Agreement and the guidance of a Certified Financial Planner®, clients who might otherwise not be appropriate candidates for Private Wealth Management services may engage the firm for fundamental Asset Allocation, Risk Management, Financial, Tax & Retirement Planning, Cash Management and Basic Estate Planning via the e-Money web-based financial planning platform for a monthly fee of \$250.00, payable quarterly in advance.

b. Qualified Retirement Plan Consulting

Under a separate written Agreement pursuant to US Department of Labor Interim Rule sec. 2550.408b-(2)c, a corporate Qualified Plan Sponsor may hire the firm for the installation and investment-only management of a custom-tailored qualified retirement plan solution.

c. Flat Fee and Hourly Services

Under a separate written Agreement, the firm may, at its discretion, offer a variety of the above services for a flat fee or at an hourly rate. The fee and terms will vary by client.

Tailored Relationships

A client goals analysis and Investment Policy Statement are typically used to define and measure risks and determine the appropriate course of action for each individual client. Services can be tailored, and clients may request certain investment restrictions in their Investment Policy Statement.

Assets under the Firm's Management ("AUM").

As of the March 1, 2025 filing date hereof, FirsTrust managed approximately \$200,000,000.00.

Item 5: Fees and Compensation

The form's only compensation is a single, transparent quarterly fee (negotiable at Management's discretion.)

1. Fees for Private Wealth Management Services

Unlike most similar firms, FirsTrust does NOT impose a Tiered Fee Schedule*. We offer a single, *Flat Fee* or a *Flat Percentage* fee on Assets Under Management based upon the scope of services chosen by the client (listed below). A minimum fee may apply. Annual fee percentages are shown below.

	< \$1m	\$1-3m	\$3-5m	\$5-10m	\$10-20m	\$20m+
Investment Management	flat fee	.85%	.75%	.65%	.55%	Negotiable
Investment Tax Management	flat fee	.15%	.10%	.10%	.05%	Negotiable
Financial & Retirement Planning	flat fee	.25%	.15%	.10%	.05%	Negotiable
Strategic Tax Planning	flat fee	.10%	.10%	.10%	.05%	Negotiable
Advanced Estate Planning	flat fee	.10%	.10%	.10%	.05%	Negotiable

Fee Billing and Calculations

*Although a common industry practice, FirsTrust believes the client's best interest is not served by **Tiered Fee Schedules** where, regardless of your total investment assets, the lower "tier" amounts are still charged a higher fee percentage; only the higher asset tiers receive incrementally reduced fee percentages. For example: A client with \$1 million of assets under management is charged 1.5% on the first \$500,000 of assets, and 1% on the next \$500,000. The total annual fee is \$11,250; or 1.125%.

FirsTrust's **Flat Percentage Fee Schedule** applies a single, flat fee percentage to the client's entire portfolio, not just the upper asset tiers; resulting in a lower overall fee than traditional Tiered Fee Schedules. For example, the same client above with \$1 million of assets would simply pay a flat 1% fee on the entire portfolio. A minimum fee may apply.

Fees are typically deducted from client accounts quarterly, in advance, based upon the Flat Fee or Flat Percentage stated in each client's Financial Services Agreement. For example, per the above schedule, the Flat Percentage for a client with \$3-5 million AUM who engages our entire scope of services would be 1.20% (.75%+.10%+.15%+.10%+.10%). Quarterly, one-fourth of this annual fee percentage is multiplied by the market value of investment accounts as of the final trading day of the prior quarter. These quarterly fees are non-refundable. For new client relationships, initial fees accrue prorated based upon initial estimates of account values being managed until such amounts are under our management.

Other Fees

FirsTrust charges and receives no other fees. Custodians of the client's assets charge transaction fees which are usually small and inconsequential to the purchase or sale of a security. In some cases, custodians charge monthly, quarterly or annual custody fees. Additional fees for trading and/or custody are explained to clients when the arrangement is recommended. Mutual funds and exchange-traded funds generally charge a built-in fee for their services as asset managers; typically found in their expense ratios. These fees are in addition to the fees paid by the client to FirsTrust; the firm explains them but does not receive any portion of them.

Past Due Accounts and Termination of Agreement

Private Wealth Management service Agreements may be terminated at any time by either party by providing written notice. Termination shall be deemed to occur on the final day of the corresponding calendar quarter, since fees are billed in advance and are not refundable. None of the firm's Agreements shall be assigned without client consent.

Agreements engaging FirsTrust for hourly services may be terminated at any time by either party by providing written notice. Termination shall be deemed to occur upon receipt of such notice, and any collected but unearned fees shall be refunded.

Compensation for Sales of Investment Products

The firm's sole compensation is from fees paid directly by our clients. FirsTrust accepts absolutely no form of third-party incentive compensation, specifically to preserve the objectivity of our advice, and our fiduciary duty of client loyalty, from outside influences.

Item 6: Performance Based Fees and Side By Side Management

Sharing of Capital Gains

FirsTrust does not share in investment performance or capital gains on client assets because of the powerful potential conflict of interest these arrangements present. FirsTrust strongly believes that our available arrangements better align our interests with the clients'.

Item 7: Types of Clients

Description

FirsTrust generally provides investment advice to individuals, families and their legal entities as well as other advisors. Client relationships often vary in scope and length of service.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss

Methods of Analysis

Industry conferences, conference calls, on and off-site visits, filings with the Securities and Exchange commission, and subscription analytic and research services are the primary methods for both portfolio and security analysis.

Investment Strategies

The firm's investment strategies are determined by its Investment Committee; governed by Chief Investment Officer Christopher Cannon, CFA as Committee Chairman. All Investment Adviser Representatives of the firm are deemed Members. All the firm's employees and Investment Advisors under Sub-Adviser arrangements are welcome to attend Committee meetings.

Investment strategies employed for clients are customized and developed for the unique situations of each client. FirsTrust believes Private Wealth Management is a discreet discipline and employs skills and techniques combined specifically to address each client's situation in the context of prevailing capital market conditions.

FirsTrust generally considers the strategy of strategic asset allocation combined with a value orientation, in conjunction with investment research on the general investment climate, various asset classes, and individual securities and/or strategies when implementing client investment portfolios. Each specific strategy for each client is based upon the objectives, cash flow requirements, estate plan, tax situation, and/or existing portfolio for each client. Each client portfolio is constructed and implemented with the goal of meeting each individual client's needs. FirsTrust views the investment policy statement as central in guiding each client's investment strategy.

FirsTrust's investment strategies typically incorporate a longer-term orientation, focusing on patience, discipline, and the concept of value. FirsTrust also believes that the flexibility to both overweight and underweight assets based upon these three principles is crucial to longer-term investment success. FirsTrust encourages an atmosphere for calm, reasoned, independent, and intellectually honest investment decision making and is willing to stand apart from the crowd when conditions are believed to warrant such behavior. FirsTrust strongly believes its fiduciary duty of due care requires acting with independent judgment.

Risk of loss

All investments and investment strategies have risk borne by the investor. Our investment process and principles endeavor to consider the risks and explain them to our clients throughout our relationship. Risks to the investor include the loss of capital, the loss of principal, interest-rate risk, market risk, security specific risk, inflation risk, currency risk, reinvestment risk, sequence of returns risk, business risk, liquidity risk, credit risk, and various other risks that can decrease the value of the investment portfolio. Taking all of this into consideration, FirsTrust strives to evaluate and anticipate these risks for each investment portfolio. FirsTrust does not consider volatility a longer-term risk of loss and believes volatility is better understood as opportunity.

Item 9: Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in any legal or disciplinary events related to their past or present investment activities.

Item 10: Other Financial Industry Activities and Affiliations

Activities

FirsTrust does not participate in any other industry business activities.

Affiliations

FirsTrust does not have arrangements that are material to its advisory business or its clients with any related person.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

FirsTrust has committed to uphold various Code of Ethics standards and to notify all employees of their ethical duties. Employees of FirsTrust agree to the Firm's Code of Ethics and these additional Codes as applicable:

Advisors designated as **NAPFA-Registered Financial Advisors** have committed to uphold a Code of Ethics and Fiduciary Oath as outlined by the National Association of Personal Financial Advisors (NAPFA). The key points are: putting the clients' interest first, objectivity, confidentiality, competence, fairness and suitability, integrity and honesty, regulatory compliance, full disclosure, and professionalism.

Advisors who hold the **CFP®** designation are also held to a Code of Ethics as outlined by the CFP® Board of Standards.

Advisors who hold the **CFA** designation as CFA charter holders are also held to a Code of Ethics as prescribed by the CFA Institute.

Advisors who hold the **CLU** or **ChFC** designations are also held to a Code of Ethics as prescribed by The American College.

Advisors who hold the **CIMA** designation are also held to a Code of Ethics as outlined by the Investment Management Consultants Association.

The Institute For The Fiduciary Standard

FirsTrust has voluntarily subscribed to the "Real Fiduciary™ Practices" published by the Institute for the Fiduciary Standard. Real Fiduciary™ Practices offer a simple code of conduct and outline a commitment to clients of subscribing financial advisors. They seek to clearly articulate what a client can expect to receive from a subscribing financial advisor. These Real Fiduciary™ Practices do not replace our regulatory compliance obligations or duties to clients under relevant laws, rules, or regulations. The Institute for the Fiduciary Standard's role is limited to publishing the practices as well as maintaining a corresponding register of subscribing financial advisors. Consumers can verify FirsTrust's affirmation of Real Fiduciary™ Practices on the firm's website or at the Institute for the Fiduciary Standard website at www.thefiduciaryinstitute.org.

Participation or Interest in Client Transactions and Personal Trading

FirsTrust and its employees may at times buy or sell securities that are also held by clients. Employees may not trade their securities ahead of clients or contrary to client positions, purchased or sold, except under conditions of hardship, when determined unlikely to impact any client, and subject to compliance review and approval. FirsTrust employs procedures including restricted periods for employees prior to and after a security is purchased or sold for a client. Such restrictions do not apply to mutual funds or exchanged traded funds because the employees' trading activities are believed to be insignificant to the markets, and they have no influence over specific holdings within fund structures.

Item 12: Brokerage Practices

Selecting Brokerage Firms

FirsTrust has no affiliations with financial product manufacturing or sales firms. Specific custodian recommendations are made to clients based on their need for such services, balanced with FirsTrust's abilities to efficiently manage portfolios. FirsTrust recommends custodians based on factors such as the execution of orders at reasonable commission rates, and the quality of service.

FirsTrust recommends discount brokerage firms, trust companies, and qualified, independent institutional custodians such as Schwab. FirsTrust does not accept fees or commissions from any of these arrangements, although FirsTrust and its clients may benefit from electronic delivery of information, electronic trading platforms and other such service benefits that are normally available from traditional custodian relationships.

Soft Dollars

FirsTrust does not accept soft dollar benefits from the custodians to whom the firm recommends clients. FirsTrust and clients may benefit from other services provided by custodians, such as research, continuing education, and practice management advice. These benefits are considered standard in a relationship with these custodians and are not in return for client recommendations or transactions.

Directed Brokerage

FirsTrust does not typically direct brokerage for specific client transactions except individual bonds, for which the firm selects the broker-dealer with the most favorable pricing.

Block Trading

When more than one account is trading a particular security on the same day, block trading may be used to obtain identical pricing for all affected clients on the trades; more often for stock sales and infrequently for stock purchases.

Item 13: Review of Accounts

Periodic Reviews

Advisors typically review on-going managed portfolios with their clients each quarter. Consulting Service clients may return periodically, at their own expense, for an update. Investment Policy Statements are reviewed by the Chief Investment Officer.

Review Triggers

Portfolio reviews for FinancialTeam clientele are often performed more frequently when market conditions dictate or when a client's situation, objectives or psychology changes. A review may also be triggered by client request, when new information arises, or when relevant tax laws change.

Regular Reports

Reports are typically provided to ongoing supervisory management clients. Reports may consist of an individualized summary, our general thoughts on capital markets and the economy, portfolio performance, tax-related information, updates to a financial plan, charts, graphs, and/or other reports as needed. They are always in addition to, never in lieu of, client custodian statements.

Item 14: Client Referrals and Other Compensation

Incoming Referrals

FirsTrust has been fortunate to receive many referrals from other clients, attorneys, accountants, employees, professional associations, personal friends and other sources. The firm pays nothing for most of these referrals. Certain non-affiliated individuals may be engaged under a written Solicitor's Agreement to offer the firm's services to prospective clients. A full explanation of the referral terms is provided to those prospective clients at the time of solicitation. Client fees shall be uninfluenced by any referral fees and consistent with the level of services provided.

Referrals to Other Professionals

FirsTrust does not accept referral fees.

Item 15: Custody

Account Statements

Client assets are typically held at qualified, independent custodians, who provide account statements directly to clients at their address of record at least quarterly. Clients are encouraged to carefully review the statements provided by their custodians. Clients are, at times, also provided with additional statements generated by portfolio reporting and financial planning software.

SEC "Custody"

FirsTrust policy is that we do not take custody of client assets. FirsTrust provides you with investment advice, while an independent custodian such as Schwab maintains custody of your assets in a brokerage account and will effect transactions for your account on our instruction.

"Custody" regarding fees

FirsTrust is deemed to have custody because our fees are directly debited from client accounts. Debiting of fees is done, usually quarterly, pursuant to a written, signed authorization provided by each client. Clients will receive a statement, usually monthly but no less than quarterly, directly from their account custodian. Custodial statements include account holdings, market values and any activity that occurred during the period, including the deduction of fees. FirsTrust urges clients to review the information on the statement for accuracy and compare the information to any reports received directly from FirsTrust. Differences in portfolio value may occur due to various factors, including but not limited to: (1) unsettled trades; (2) accrued income; (3) pricing of securities; and, (4) dividends earned but not received.

FirsTrust is also deemed to have custody of client assets as a result of clients authorizing the firm to distribute assets from their accounts to a specific named recipient in accordance with a standing Letter Of Authorization. FirsTrust intends to comply with the SEC No-Action Letter dated February 21, 2017 (Investment Adviser Association) allowing firms who comply with all of the provisions of the no- action letter to forego the annual surprise custody examination with respect to those assets.

Item 16: Investment Discretion

Discretionary Authority for Trading

FirsTrust accepts discretionary authority to manage investment accounts on behalf of clients who select on-going FinancialTeam investment management services. This grants FirsTrust the authority to determine, without obtaining specific client consent, the investments to be then bought or sold, and the amount of the investments to be bought or sold.

Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that the advisor may implement the Investment Policy approved by the clients. In some cases, clients may impose trading limitations on this authority by designating certain securities be held, or avoided, in the Investment Policy Statement. In other cases, where applicable, third-party investment managers have full discretion over trades and do not consult with FirsTrust, or with clients, before placing trades. In all cases, clients are provided with an opportunity to review and discuss prior to the implementation of general investment recommendations.

Limited Power of Attorney

Clients typically permit discretionary trading authority in their service agreement with FirsTrust, and all clients must sign a limited power of attorney before FirsTrust is granted the discretionary authority. The limited power of attorney is generally included in the qualified custodian's account application.

Item 17: Voting Client Securities

Proxy Votes

FirsTrust will accept authority to vote client securities, but does not require it.

Once explained, clients generally request FirsTrust to vote their proxies because they are unfamiliar, unwilling, or uninterested in voting proxies themselves. Most clients find the receipt of proxies a nuisance and report they simply throw proxy material away.

FirsTrust strives to vote proxies or other beneficial interests in client securities solely in the best long- term economic interest of advisory clients and their beneficiaries, considering relevant factors and without undue influence from individuals or groups who may have an economic interest in the outcome of a proxy vote.

FirsTrust retains the services of an outside proxy administrator to assist in applying the proxy voting policy and proxy voting reporting for FirsTrust's clients. The proxy administrator places and records the votes based upon standing instructions given by FirsTrust to the proxy administrator.

FirsTrust generally instructs the proxy administrator to vote with the Board of Directors (which shares in the Fiduciary duty to shareholders) on most matters.

FirsTrust generally opposes anti-takeover measures since they tend to reduce shareholder rights. Examples of such issues include prevention of Greenmail, supermajority provisions, poison pills, and other defensive strategies that may harm longer-term economic value for shareholders.

FirsTrust makes its best efforts to avoid material conflicts of interest in the voting of proxies. However, should material conflicts of interest arise, FirsTrust is committed to disclosing and resolving the conflict of interest in the clients' interests. If a conflict arises, FirsTrust may contact the client, contact a third-party proxy consultant, a compliance consultant, another shareholder, or refer to the Proxy Voting Policy for guidance.

Using FirsTrust's designated proxy service, clients may direct a proxy vote by calling or writing FirsTrust to inform us of their desired vote directed on a best-efforts basis. Copies of an individual client's historical votes and FirsTrust's Proxy Voting Policy are available upon request.

Item 18: Financial Information

Financial Condition

FirsTrust has no financial impairment that precludes the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because FirsTrust does not serve as a custodian for client funds or securities, other than as described above, and does not require prepayment of fees six months or more in advance.

Item 19: Business Continuity and Disaster Response/Recovery Plan

General

FirsTrust has a Business Continuity Plan in place that includes a cross-purchase Buy-Sell Agreement in the event of an owner's death.

Disasters

The written, periodically updated Disaster Response and Recovery Plan covers natural disasters such as storms, hurricanes, tornados, fire, and flooding.

The Plan details provide a broader call to action that can also apply in the event of a loss of electrical power, fire, bomb threat, nuclear emergency, chemical event, biological event, communications outage, Internet outage, railway accident and/or aircraft accident.

Electronic files are now stored on internet Cloud services and virtually accessible from anywhere in the world.

Alternate Offices

Alternate work locations are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving the office to an alternate location.

Information Security Program

FirsTrust' Chief Information Security Officer oversees compliance with SEC regulations release 17 CFR part 248 pertaining to the safeguarding of customer records and information. FirsTrust maintains firewall barriers, implements secure data encryption protocols, utilizes secure authentication techniques, and provides cyber security employee training in our computer environments.

Privacy Policy

FirsTrust is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

To best preserve that information, we employ a "no-opt" disclosure policy that requires no action on behalf of the client to "opt- out" of sharing or selling their private information.

To further enhance privacy, we regard the identity of each client as Classified with the same practical intent attributed to the attorney-client privilege.

The categories of nonpublic information FirsTrust collects from clients may include information about personal finances, information about health to the extent that it is needed for the financial planning process, and information about transactions between clients and third parties. We use this information to help our clients meet their personal financial goals.

Only with a client's written or electronically authorized consent will the firm disclose limited information to attorneys, accountants, and/or third parties authorized in the client's agreement.

The firm does **not** provide personal information to mailing list vendors or solicitors. A Privacy Notice is delivered to FirsTrust clients annually, in writing, as required by law.