

THE PREMIER PARTNER TO PROFESSIONAL CPA WEALTH MANAGEMENT FIRMS.

PROVIDING RESEARCH, CONSULTING AND SERVICE TO ADDRESS COMPLEX

AND SOPHISTICATED FINANCIAL ISSUES AND OPPORTUNITIES.

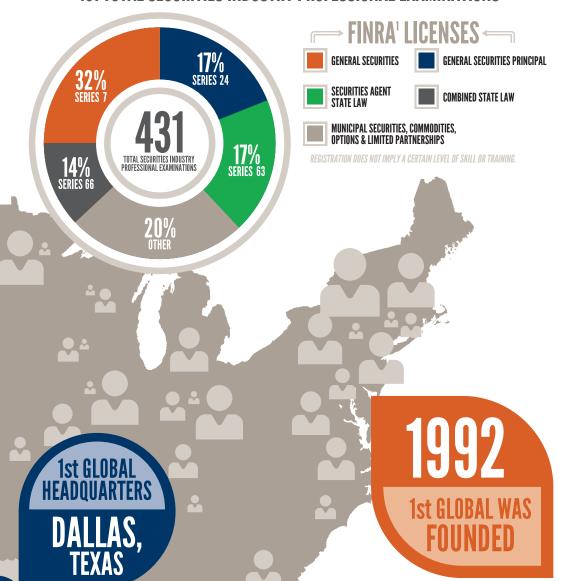




FIRM FACTS



OVER 200 EXPERIENCED HOME OFFICE FINANCIAL PROFESSIONALS 431 TOTAL SECURITIES INDUSTRY PROFESSIONAL EXAMINATIONS



1st Global Capital Corp.

Member of Finra¹, Sipc²

¹FINANCIAL INDUSTRY REGULATORY AUTHORITY
² SECURITIES INVESTOR PROTECTION CORPORATION

1st GLOBAL'S

1st Global was established in 1992 with a core belief that CPAs and tax professionals are uniquely qualified to provide comprehensive financial guidance to clients. Firms that affiliate with 1st Global deliver tax-optimized wealth management services to businesses and families. With a broad understanding of your tax situation, your business, your estate and your entire financial picture, these professionals are specially positioned to provide independent, objective wealth management advice.

1st Global is driven by a belief in personal responsibility and having the discipline to always do the right thing. With a focus on leading academic research, proven best practices, comprehensive financial planning and informed consulting, we have the privilege to provide essential operations, research and support to over 400 CPA firms nationwide.

WE EMPOWER FIRMS TO SUCCEED IN HELPING THEIR CLIENTS DISCOVER, MAKE AND HONOR THE PROMISES THEY'VE MADE TO THE ONES THEY LOVE.

DESIGNATIONS such as CPA', CFA², CFP®³, CIMA⁴, ChFC®⁵ and CLU®6

¹ Certified Public Accountant, ² Chartered Financial Analyst, ³ Certified Financial Planner, ⁴ Certified Investment Management Analyst, ⁵ Chartered Financial Consultant, ⁶ Chartered Life Underwriter

in the home office

Certified Financial Planner Board of Standards Inc. owns the certification marks CFP®, CERTIFIED FINANCIAL PLANNER $^{\text{\tiny{M}}}$ and federally registered CFP (with flame logo), which it awards to individuals who successfully complete initial and ongoing certification requirements.

that independence of product is the key to providing the right financial solutions.

Since the privately-owned company is not a subsidiary of any financial institution, such as a bank or insurance company, your financial advisor has the independence and objectivity necessary to create the best solutions that meet your unique wealth

1st Global understands



MISSION AND VALUES

RESEARCH AND CONSULTING

1st Global helps affiliated wealth management firms be better tomorrow than they are today in a way that is meaningful to you — the client. As financial services increasingly become both commoditized on one hand, and much more complex on the other; the care, concern and deep commitment to help professionals achieve the ideal picture of themselves and their firms are what set 1st Global apart. This is the spirit of consulting and advice.



However, consulting and advice without supportive scholarly evidence is merely the sharing of opinions. Ist Global is committed to an intellectually rigorous approach in forming our ideas, processes and philosophies. What began as a desire to help our affiliated firms and professional advisors with their needs has transformed into many areas of original, proprietary research. We believe in the power and advantages of primary and usable research to bring value to you.

Service excellence and consulting, powered by intensive primary research, are the pillars that define 1st Global and its affiliated firms today and for many years to come.

ist Global believes that CPAs are the most qualified providers of complex, sophisticated wealth management solutions in America. If tax planning is not at the core of a financial plan, the plan may fail to deliver optimal benefits to you. As one of the most trusted professions in America, CPAs are uniquely qualified to provide this essential foundation.



QUALITIES OF 1st GLOBAL AFFILIATED ADVISORS

1st Global partners directly with CPAs and financial advisors of high-quality CPA firms who are committed to excellence in providing holistic wealth management advice and services to their clients.

1st Global affiliated advisors are:

- → Competent, professional and deliver the highest level of integrity to complement the traditional services and high practice standards of CPAs
- → Independent and objective in crafting client investment portfolios
- → Passionate about comprehensive financial planning
- → Accomplished business owners and professionals with strong track records of success

1st Global is the only independent wealth management services partner that has a proven system to successfully integrate CPAs and professional financial advisors into strategic business models that serve the complex needs of affluent families.



1st GLOBAL'S BELIEFS ABOUT FINANCIAL PLANNING

WITH 1st GLOBAL'S EXTENSIVE KNOWLEDGE

of the markets and unique research capabilities, your advisor has the independence and flexibility to create tax-optimized solutions designed to meet your needs The discipline to save, invest, budget, plan and manage for known and unknown risks is critical in honoring the important promises we make to those we care about. Assessing short-and long-term tradeoffs and delaying gratification have long been key factors in helping emerging affluent and affluent families make sound financial planning decisions. This difficult endeavor requires intellectual rigor, discipline, patience and faith in the future founded on a deep understanding of the past.

1st Global believes that exceptional financial planning means accounting for every possible aspect of your financial future. This integrated approach allows your advisor to weave diverse elements of your financial picture into a unified, comprehensive plan that can meet your long-term goals. To do so, 1st Global advisors evaluate 10 key areas of opportunity that are called the Method 10™ solutions.



METHOD 10™





METHOD 10™

The 10 key wealth management issues that you and your financial advisor systematically address in order to implement comprehensive financial solutions.



INVESTMENT PLANNING

Have you determined that your investment portfolios are optimally designed to help you fulfill the promises you make in life?



TAX PLANNING

Do you use all available techniques to help reduce your federal, state and local income taxes?



INCOME PROTECTION AND ASSET PRESERVATION

If you are temporarily or permanently disabled, do you feel certain that your income will continue and all of your personal, medical and business obligations will be met?



RETIREMENT PLANNING

Have you had a professional analysis done to determine if your personal retirement programs will offer you the potential to retire with independence and dignity?



BUSINESS PLANNING

When was the last time you appraised the value of your business, created your business succession strategy or prepared for contingencies in unplanned events?



ESTATE PLANNING

Do you have a current and properly drafted will, living will and/or trust that will distribute your estate in the most tax-efficient manner, and continue your legacy according to your promises, core values and wishes?



INSURANCE PLANNING

Do you feel you have an appropriate amount of life and liability insurance to help ensure that the promises you have made to your loved ones are honored?



EDUCATION PLANNING

Have you determined how you will financially contribute to the education of your children and grandchildren?



SPECIAL SITUATIONS

Does anyone in your family have special medical needs or financial considerations (such as Alzheimer's, physical disabilities, divorce, alcoholism, drug addiction or M.S.) and have you evaluated all solutions available to them and to you?



DEBT MANAGEMENT

Do you optimize the use of debt in the most cost-efficient and tax-advantaged way to meet your personal and business goals?





INVESTMENT PLANNING

Designed to strike an optimal balance between risk and reward through portfolio construction and the discipline to hold fast to one's investment program during the peaks and valleys of the business cycle.



ESTATE PLANNING

Regardless of your overall net worth, there are several non-tax reasons to fully engage your advisor on the subject of estate planning. Beyond minimizing the tax bill, your advisor can help you craft an estate plan that addresses many vital issues, such as who gets what, when and how much.



TAX PLANNING

Taxes are inevitable, but you can work to avoid unnecessary taxation through tax-optimized solutions.



INSURANCE PLANNING

Protecting your finances from the unexpected, like death or disability, is vital to the long-term financial security of your family and/or your business.



INCOME PROTECTION & ASSET PRESERVATION

By removing the fear of losing principal that often drives investors off course, loss-averse investors can select strategies that are designed to help safeguard their hard-earned capital from common pitfalls.



EDUCATION PLANNING

Effective education planning involves asset allocation, tax planning, estate and generation-skipping planning, asset protection planning and financial aid considerations.



RETIREMENT PLANNING

Individuals should approach retirement planning from three fronts: employer-sponsored plans, Social Security or other government programs, and individually-owned plans.



SPECIAL SITUATIONS

External forces such as divorce and elder care can strain even the strongest of financial plans. Planning for special situations requires proficient wealth management programs to utilize insurance, investment and tax planning skills to create an effective solution.



BUSINESS PLANNING

The majority of business owners have no written succession plan. If your wealth is tied up in your business, a lack of formal succession planning could be financially and emotionally devastating.



DEBT MANAGEMENT

Certain types of debt, such as home mortgages, are unavoidable for many. Other consumer-based debts, such as credit cards and home equity loans, can put your financial future at severe risk. Getting discretionary debt under control quickly should be your number one priority so you can focus those funds toward a comprehensive wealth management plan.



WEALTH MANAGEMENT PLATFORMS AND SERVICES

1st Global provides affiliated advisors with the essential support needed to build a successful wealth management business. Through the firm's partnership with 1st Global, your financial advisor can help you with a comprehensive suite of services and customized solutions that cover the entire spectrum of wealth management, including:

- → IRAs (including Traditional IRAs, IRA Rollovers and Roth IRAs)
- → Fee-based asset management solutions, including unified managed accounts
- → Individual securities, mutual funds and exchange-traded funds (ETFs)
- → Direct participation programs, hedge funds, private equity, real estate investment trusts (REITs) and other alternative investments* fully integrated into your financial plan using our proprietary Unified Portfolio Theory research
- → Education plans including 529 college savings plans
- → Fixed income strategies
- → Retirement income strategies
- → Wealth transfer and estate planning
- → Business planning: qualified plans and business succession
- → Insurance and annuity strategies
- → Long-term care and disability insurance

*Disclosure: Hedge funds and private equity are speculative investments and are not suitable for all investors, nor do they represent a complete investment program. The Funds are only open to qualified investors who are comfortable with the substantial risks associated with investing in hedge funds or private equity. The Funds investment programs are speculative and entail substantial risks. Investors could lose some or all of their investments.

Please note that there are special risks with investing in Limited Partnerships and REITS, such as lack of liquidity and potential adverse economic and regulatory changes. For this reason, there are minimum suitability standards that must be met. Please ensure you read the prospectus carefully before investing. In addition, an investment in real estate will fluctuate with the value of the underlying properties, and that the price at redemption may be more or less than the original price paid.

PLATFORMS

INVESTMENT MANAGEMENT SOLUTIONS

Long-term investing is a journey that can be derailed by roadblocks, doubts and chance. Knowing what investment fundamentals you believe in will allow you to see the path before you more clearly.

Investment Management Solutions[™] (IMS) provides you with a disciplined investment process, a flexible platform and robust programs. IMS offers personalized solutions for investing built around your unique goals, time horizon and tolerance for market volatility. Through IMS, you have access to more than 5,000 mutual funds, exchange-traded funds (ETFs) and a selection of professional money managers. The robust strategies in IMS utilize fund families such as Fidelity, Vanguard, PIMCO, John Hancock, Dimensional Fund Advisors, iShares and Oppenheimer.

Through 1st Global IMS, you have access to multiple programs supported by our investment beliefs, intellectual rigor, research and asset allocation models. The IMS Select Portfolios are professionally managed investment solutions that apply some of the most accomplished financial minds of the past half century. Evaluation and selection of investment products is overseen by the 1st Global Executive Investment Committee. Special consultants to the committee include Nobel Laureate and father of Modern Portfolio Theory, Dr. Harry Markowitz and the "Father of Supply-Side Economics" and inventor of the Laffer Curve, Dr. Arthur B. Laffer and other third-party investment consultants from time to time as the committee deems appropriate.



- 1
- RELY on your financial advisor to provide you with ongoing, personalized advice
- REVIEW
 your portfolio to ensure it remains
 in line with your objectives
- 3 STAY FOCUSED on the long term

- MANAGE
 market volatility through
 diversification and rebalancing
- MAINTAIN
 a long-term perspective when the
 market experiences highs and lows



IMS Select Portfolios provide the discipline, capability and process necessary to help you reach your investment goals. Using a comprehensive process to understand your feelings, beliefs and objectives, you and your advisor collaborate to choose a strategy that is right for you. Each strategy delivers professional investment management with the added benefit of consistent long-term performance objectives, automatic rebalancing and tax efficiency.



IMS Select Portfolios offer over 50 different portfolios across five distinct investor profiles (Ultra Conservative, Conservative, Moderate, Growth and Aggressive Growth), are highly diversified across seven core asset classes and can be implemented utilizing either managed mutual funds, passive exchange-traded funds or a blend of these investment vehicles, along with alternative investment strategies.

Each of the IMS Select Portfolios strategy options can be implemented using taxable fixed income or national municipal bond strategies.

INVESTMENT MANAGEMENT RESEARCH GROUP

1st Global Investment Management Research Group is tasked with finding "best-of-class" investment managers and products for use in the IMS platform.

The Investment Management Research Group (IMRG) plays a vital role in the overall success and development of the IMS platform. IMRG operates under the oversight of 1st Global's Investment Committee and is tasked with finding "best-of-class" investment managers and products for use across 1st Global's IMS platform. IMRG adheres to a highly standardized due diligence process to maintain the integrity of its investment philosophy as embodied in 1st Global's model portfolios and applied throughout IMS. As a team, this group's credentials include the CFA designation, the CFP® designation, the CIMA® designation and the Certificate in Investment Performance Measurement (CIPM®) designation.

Disclosure: Part 2A of the Form ADV: Firm Brochure and Part 2B of Form ADV: Brochure Supplement will be provided to you prior to opening an advisory account. It contains full information on our advisory programs.



PLATFORMS

SUSTAINABLE INCOME SOLUTIONS™

1st Global Sustainable Income Solutions™ (SIS) is an exclusive process that was created to provide realistic answers to the complex challenges of generating enough income to provide you with your ideal retirement.

Discovering what your ideal retirement looks like is an important first step in the retirement income planning process. To best help you achieve this vision, several items must be carefully evaluated and addressed. When establishing sustainable income for life, it is imperative to properly identify and focus on the situations or events that could cause your wealth to run out. There are four key risk categories, each with two components, to consider:



Understanding these eight risks is imperative to creating sustainable income solutions that are intended to last the span of your life and beyond. A critical step in the Sustainable Income Solutions™ process is to assess how these eight risks may affect your vision of retirement and discuss how you and your financial advisor can work together to mitigate them.

Creating sustainable income for life is as much about an integrated implementation process as it is about the product solutions used in the plan. There are a number of solutions available to create retirement income, but to create sustainable income, an advice-based planning process must be incorporated. Sustainable Income Solutions™ requires extensive interaction and conversation between you and your financial advisor. This process provides you with the knowledge that your advisor has put plans in place to help ensure that you reach your long-term retirement goals.



PLATFORMS

RETIREMENT MANAGEMENT SOLUTIONS™

1st Global's Retirement Management Solutions™ (RMS) is a retirement plan consulting platform supported by a team of pension and ERISA professionals who will guide you and your financial advisor through the intricacies of the complex regulatory environment and the duties of a plan fiduciary.

RMS leverages the intellectual rigor of IMS to provide you and your financial advisor support through the elements required to customize your retirement plan:

- → Fully disclosed, clear and simple vendor fee structures with no soft dollar or wrap revenue
- → Customized advisory fees based upon the negotiated ongoing plan service relationship between you and your financial advisor
- → The flexibility of both fiduciary and non-fiduciary advisor support structures
- → Creative plan design, both qualified and non-qualified, offered through national vendors and their regional pension consulting teams
- → Vendor fiduciary solutions to support plan sponsors with investment monitoring and plan compliance administration
- → Access to 1st Global's actively and passively managed proprietary asset allocation models
- → Access to vendors offering consolidated or unbundled pension administration, fiduciary governance and record-keeping services

1st Global's RMS consultants work with you and your financial advisor to craft a custom solution which is based upon the unique needs of your employees and your business. 1st Global's RMS consultants can help guide you and your financial advisor to:

- → Design the most appropriate type of retirement plan for your business with features that support your goals
- → Assist you in developing an appropriate investment menu to meet your plan's objectives
- → Guide you through the implementation or conversion of your plan
- → Craft an employee education campaign covering such concepts as retirement planning, asset allocation* and behavioral finance
- → Monitor the progress of your plan to help you and your financial advisor manage your fiduciary obligations

Customize an affordable retirement plan to meet the unique needs of your business

*Disclosure: Asset allocation does not ensure a profit against a loss in declining markets.



WEALTH MANAGEMENT CONSULTING SERVICES

PRACTICE CONSULTING

The 1st Global Practice Consulting Group is 1st Global's primary education and coaching liaison for your financial advisor.

Your tax-centric financial advisor is highly trained and experienced in all areas of Method 10™ and business growth. Just as a personal life coach guides you to be a better version of yourself, 1st Global strongly believes in providing its affiliated firms with progressive, ongoing technical education in the discipline of wealth management. In this ever-changing business environment, the Practice Consulting Group works with your financial advisor in key areas of their practice.

WEALTH MANAGEMENT CONSULTING SERVICES

FINANCIAL CONSULTING

The 1st Global Financial Consulting Group is your advisor's primary resource for delivering cutting-edge client solutions.

Financial consulting provides support to advisors with the following:

- → Comprehensive financial planning
- > Portfolio analysis and design
- → Client solutions expertise
- → Integrating Sustainable Income Solutions™
- → Tax-efficient investment strategies
- → Education planning
- → Expertise in mutual funds, exchangetraded funds (ETFs), separately managed accounts and alternative investments





WEALTH MANAGEMENT CONSULTING SERVICES

ADVANCED CASE DESIGN

The 1st Global Advanced Case Design Group is a an exclusive resource available to your advisor. The Advanced Case Design Group provides expertise, assistance and analysis for complex cases pertaining to high-net-worth clients.

This highly trained, experienced group of financial professionals supports advisors with the design and implementation of complete wealth management solutions across:

- → Business succession planning
- > Trust and estate planning
- → Tax planning
- → Qualified retirement plans
- > Executive benefit plans
- → Risk management
- → Tax-free real estate exchanges

These disciplines are especially critical for affluent clients and clients with complex financial situations.

WEALTH MANAGEMENT CONSULTING SERVICES

INSURANCE CONSULTING & CASE SUPPORT

Whether it is for your business, retirement or estate planning, a comprehensive financial plan should include risk management solutions.

Insurance and annuity products can be complex, and their features change frequently. Through support, advice and implementation strategies such as product selection, comparisons, financial and medical underwriting, policy illustrations and quotes, 1st Global's insurance team supports your advisor in providing you with the optimal solution to protect you, your family and your business.





- → ADVANCED CASE DESIGN
- → INSURANCE CONSULTING & CASE SUPPORT
- → CAPITAL MARKETS



WEALTH MANAGEMENT CONSULTING SERVICES

CAPITAL MARKETS

The 1st Global Capital Markets Group supports your advisor with his or her trading and market-related needs.

This specialized team of fixed income, equity, options, brokerage and managed account research and trading professionals provides you and your financial advisor access to a wide range of resources, products, education, advice and consulting that will enable you to better reach your financial goals.

These resources include access to the following:

- → An online trading platform and phone order system
- → Automated managed account trading solutions
- → Market research
- → Fconomic research
- > Investment due diligence
- Provides support in creating customized fixed income portfolios that best meet your needs
- → Equities, mutual funds, exchange-traded funds (ETFs), unit trusts, commodities, publicly-traded real estate investment trusts (REITs) and limited partnerships, options, bonds, preferred stocks and structured products

Disclosure: Hedge funds and private equity are speculative investments and are not suitable for all investors, nor do they represent a complete investment program. The Funds are only open to qualified investors who are comfortable with the substantial risks associated with investing in hedge funds or private equity. The Funds investment programs are speculative and entail substantial risks. Investors could lose some or all of their investments.

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INVESTOR PROTECTION AND CUSTODIAL AGREEMENT

1st Global takes the responsibility of protecting investor assets seriously. The company performs ongoing due diligence on proprietary portfolio models, and the investment options it approves meet a high due diligence standard.

Since 1998, 1st Global has engaged National Financial Services LLC (NFS), a Fidelity Investments company, to provide clearing and custody solutions. NFS is an industry leader of these services, providing them to more than 300 leading financial services firms nationwide. Custody of all the securities held in your 1st Global brokerage account(s) and IMS portfolio(s) is carried by NFS. 1st Global and NFS are members of the Securities Investor Protection Corporation (SIPC), a federal non-profit corporation that protects customer assets in the unlikely event that a member fails to meet its financial obligations.

These securities are protected in accordance with the Securities Investor Protection Corporation (SIPC) up to \$500,000 (including cash claims limited to \$250,000). For details, please see www.sipc.org. NFS has arranged for additional protection for cash and covered securities to supplement its SIPC coverage. This additional protection covers total account net equity in excess of the \$500,000/\$250,000 coverage provided by SIPC. Neither coverage protects against a decline in the market value of securities.

In addition, 1st Global financial advisors carry insurance for specifically covered negligent acts, and errors or omissions in conducting financial services. The policy covers up to \$1 million for each wrongful act and \$5 million in aggregate for the policy period.

1ST GLOBAL ADVISORS ARE PASSIONATELY DEDICATED TO THEIR CLIENTS



THE POWER OF RESEARCH

No organization can be an effective business consultant to other business partners and to individual clients without a commitment to intellectually rigorous primary research and educated selection of secondary research. 1st Global stands apart from other wealth management service providers as a dedicated research company, consistently publishing whitepapers and other scholarly pieces such as Sustainable Income Solutions™, CPAs and Wealth Management, Unified Portfolio Theory™ and much more.

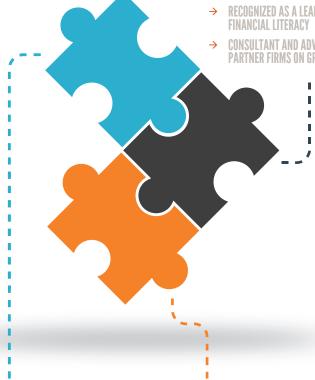
1st Global's research is supported and illuminated by some of the greatest minds of the last century. Among the members of 1st Global's advisory board are Harry M. Markowitz, Ph.D., recipient of the 1990 Nobel Memorial Prize in Economic Sciences for his dissertation on Modern Portfolio Theory, Dr. Arthur B. Laffer, "Father of Supply-Side Economics" and inventor of the Laffer Curve, and Carl George, former Clifton Gunderson CEO and one of the "Top 10 Most Influential People in Accounting."

As advisors and consultants to the 1st Global Investment and Executive Committees, these advisors help 1st Global formulate knowledge capital, create proprietary research on portfolio analysis, economics and CPA firm succession.

All of the research that 1st Global originates, and research written by our advisors, is shared with its CPA wealth management firms and, when appropriate, with its firms' clients. This is another reason why 1st Global believes its affiliates — your trusted advisors — are some of the most informed and well-educated wealth managers in the country.

CARL GEORGE

- → 16 YEAR CEO OF CLIFTON GUNDERSON. A \$250 MILLION CPA FIRM
- TOP 10 MOST INFLUENTIAL PEOPLE IN ACCOUNTING BY ACCOUNTINGTODAY
- RECOGNIZED AS A LEADER FOR HIS WORK IN
- CONSULTANT AND ADVISOR TO 1ST GLOBAL AND PARTNER FIRMS ON GROWTH. M&A AND SUCCESSION



DR. HARRY M. MARKOWITZ

- NOBEL PRIZE RECIPIENT FOR INVENTING MODERN PORTFOLIO THEORY
- RECIPIENT OF VON NEUMANN PRIZE IN OPERATIONS RESEARCH THEORY FOR HIS **WORK IN PORTFOLIO THEORY**
- AWARDED "MAN OF THE CENTURY" BY PENSIONS & INVESTMENTS
- ADVISOR TO 1ST GLOBAL'S INVESTMENT MANAGEMENT SOLUTIONS (IMS) INVESTMENT COMMITTEE AND CONSULTANT TO 1ST GLOBAL'S INVESTMENT MANAGEMENT RESEARCH GROUP (IMRG)

DR. ARTHUR B. LAFFER

- FATHER OF SUPPLY-SIDE ECONOMICS AND INVENTOR OF THE LAFFER CURVE
- FOUNDER AND CHAIRMAN OF LAFFER ASSOCIATES. AN ECONOMIC RESEARCH FIRM THAT PROVIDES **GLOBAL INVESTMENT-RESEARCH SERVICES TO** FINANCIAL INSTITUTIONS
- MEMBER OF PRESIDENT REAGAN'S ECONOMIC POLICY ADVISORY BOARD AND FISCAL POLICY ADVISOR TO PRIME MINISTER MARGARET THATCHER
- ECONOMIC ADVISOR TO 1ST GLOBAL'S INVESTMENT MANAGEMENT SOLUTIONS (IMS) INVESTMENT COMMITTEE AND CONSULTANT TO 1ST GLOBAL'S **EXECUTIVE MANAGEMENT TEAM**



SECURITY AND PRIVACY

1st Global, our affiliates and the entire securities industry go to great lengths to protect the privacy of clients' personal financial information. The high marks investors give firms for their services reflect a simple business reality: by putting the interests of our customers first and helping them to succeed, we, in turn, do well.

We think our ability to share financial information within our company enables us to more effectively serve our customers in several ways. By knowing about investors' finances and goals, we are better informed to make suitable investment recommendations. Only those members of our staff who require your information to establish or service an account or analyze a case have access to your information. We take great care to ensure these professionals are properly trained and act in accordance with our privacy policy and applicable laws to protect your privacy.

We understand the value and importance of keeping our clients' information secure. When customers open accounts, we tell them about our own privacy protections and the different federal laws that also provide safeguards.



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