

## Introduction

First Citizens Investor Services, Inc. ("FCIS") is registered with the Securities and Exchange Commission ("SEC") as both a broker-dealer and an investment adviser and is a member of the Financial Industry Regulatory Authority ("FINRA"). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Easy-to-use, free tools are available to investors to help them research firms and financial professionals at [investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## What investment services and advice can you provide to me?

We offer both brokerage and investment advisory services to retail investors.

### Broker Dealer Services Brokerage Accounts

Our brokerage services include buying and selling securities for retail customer accounts.

As a part of our standard services offering, these transactions can be performed on a solicited basis (when we recommend the security to be traded) or an unsolicited basis (when you determine the security to be traded). In either case, we will be available to you on an ongoing basis to review and discuss your account and its performance, but we will not provide ongoing monitoring services for brokerage accounts.

FCIS does not have a minimum account size requirement for brokerage accounts. Some of our associates are only able to offer and/or facilitate trades in a limited selection of investments.

You make the ultimate decision regarding the purchase or sale of investments.

### Conversation Starters: Ask Your Financial Professional

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?

### Investment Advisory Services Investment Advisory Accounts

Our advisory services include wrap fee programs and financial planning. All transactions in our wrap fee accounts are performed by the selected portfolio manager on a discretionary basis. The investments selected are based on your individual investment profile, which is established at account opening.

Wrap fee accounts generally have a minimum initial investment of \$25,000, although some portfolio managers may have higher minimums.

As a part of our standard service offering, ongoing account monitoring is provided for all advisory accounts. Your investment adviser representative will meet with you regularly to discuss the performance of your account as well as your investment goals, and work with you to design a strategy to help achieve them.

Our investment advisory services are provided on a discretionary basis. We make investment decisions without discussing them with you. Discretion is triggered when you grant it and remains in effect until you revoke it. Your ability to request further limitations on this authority varies by service.

For additional information, please see the disclosure documents specific to your transactions, [Form ADV, Part 2A Brochure](#) (Items 4 and 7 of Part 2A or Items 4.A and 5 of [Part 2A Appendix 1](#)) and other applicable documents.

## What fees will I pay?

### *Broker Dealer Services Brokerage Accounts*

If you open a brokerage account, you will pay a transaction-based fee, usually referred to as a "commission," every time you buy or sell an investment. For other investments, such as bonds, this might be part of the price you pay for the investment (known as a mark-up or mark-down). For a mutual fund, this fee (typically called a "load" or "sales charge") reduces the amount invested.

Some investments (typically mutual funds and variable annuities) have ongoing internal expenses that impact the value of your investment over time. If you hold an annuity, you may also be subject to a "surrender charge" if you sell the contract within a certain period of time.

You may be subject to other miscellaneous fees such as:

- annual account maintenance fees, depending on the value of your account once opened
- paper statement mailing fees, if you choose to receive paper statements
- fees imposed by the SEC

Transaction based fees create a conflict of interest between you and FCIS, because we have an incentive to recommend more frequent transactions since they would generate more fees.

**You will pay fees and costs whether you make or lose money on your investments. 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.**

### *Investment Advisory Services Investment Advisory Accounts*

If you open an advisory account, you will pay an ongoing asset-based fee for the duration of your account relationship. This varies based on the size of your account and the specific strategy selected but will never exceed 1.95%. This fee covers most of the transaction costs and fees typically associated with an account relationship. Other account types may offer a lower level of services which may result in lower costs. Certain investments that may be held in your advisory account typically include ETFs and mutual funds. Mutual funds also charge internal expenses which may impact the value of your account over time.

The strategies offered by FCIS are determined by the money managers, which may be an affiliated investment adviser, we approve to work with our clients. Other firms may offer a different or wider selection of managers and strategies, some of which may have lower costs.

Asset based fees create a conflict of interest between you and FCIS, because we have an incentive to encourage you to consolidate your assets with us. The increase in account size could result in a lower management fee, but our overall compensation would increase.

### **Conversation Starters: Ask Your Financial Professional**

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

For additional information, please see our Fee Schedule, [Form ADV, Part 2A Brochure](#) (Items 5.A-D) and other applicable documents, such as prospectuses and contract documents, and disclosure documents related to your investments.

**What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?**

**When we provide you with a recommendation as your broker-dealer or act as your investment adviser**, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice that we provide you. Here are some examples to help you understand what this means:

Our representative has the ability to discount the commission or fees you pay on certain investments or advisory programs. These discounts create a conflict of interest between your interests and the firm's because the firm's compensation is negatively impacted when commissions and/or fees are discounted.

Not all representatives are licensed to offer both brokerage and investment advisory products and services. Some representatives may only be licensed to make recommendations regarding mutual funds or variable annuities and may not be licensed to make a recommendation for individual equities, exchange traded funds, fixed income products like bonds, or to provide investment advisory services. Some of these additional products and services may be in your best interest.

**Conversation Starters:  
Ask Your Financial Professional**

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

As noted previously, FCIS offers both brokerage and investment advisory accounts, and the compensation earned by your representative can differ depending on which account type you select. This creates a conflict of interest for our representatives who are able to offer the full suite of products and services available at FCIS.

**Third Party Payments:** When acting as a broker-dealer or an insurance agent, FCIS may receive payments from the mutual fund company or the insurance carrier that we do business with. These payments include up-front commissions, selling price concessions, and ongoing "trail" compensation (also known as 12b-1 fees) for the length of time that the mutual fund or annuity is held. The amount of these payments varies from company to company, and the FCIS representative may have an incentive to recommend an investment that pays a higher up-front or ongoing fee. In advisory accounts, FCIS credits all 12b-1 fees received for an account to the account holder.

In addition to the above payments, the companies we do business with may offer to pay or reimburse expenses related to training, marketing, and educational efforts for FCIS representatives. This could include on- or off-site training, seminars, or other events for the purposes of informing the representatives about the features and benefits of available products. This may create a conflict between you and your FCIS representative as the representative may be more likely to recommend a product to you if they have learned more about these products by participating in these types of events.

Third party providers such as insurance and annuity wholesalers (and others) may give FCIS representatives gifts totaling not more than \$100 per year, per provider. They may also provide representatives with occasional meals and entertainment (for example, tickets to sporting events) of reasonable value. This may create a conflict as your representative may be more likely to recommend the products or services of a company that provides these types of non-cash incentives.

**Revenue Sharing:** FCIS currently receives revenue sharing payments from our clearing firm, Pershing LLC, for money market distribution assistance, margin (borrowing and lending of securities) participation, and for participating in the FundVest program. The FundVest program is a platform that allows FCIS to offer a range of mutual funds and exchange traded funds to our clients with no transaction charges.

**Principal Trading:** When serving as a broker dealer, FCIS may act in a principal capacity and sell investments that are owned by FCIS. This could create a conflict of interest when a representative of FCIS recommends a trade which is then filled from FCIS' inventory, as the firm will receive the commission for the trade as well as the realized gains on the sale of the security.

FCIS representatives in different business locations may unknowingly work with multiple clients who are attempting to acquire or sell the same assets or investments. This activity may inadvertently drive the price up (or down). This conflict also exists when FCIS places trades for its own account.

For additional information please see our full [Best Interest Disclosure Document, Form ADV, Part 2A Brochure Item 11](#), and the disclosure documents for your specific transactions.

### **How do your financial professionals make money?**

FCIS representative's compensation is determined by a number of factors, but is generally determined by the following criteria:

- A percentage of the revenue generated from transactions and/or advisory fees in accounts handled by the representative. This percentage increases as the amount of overall revenue generated increases;
- Advances on future compensation, typically referred to as a "draw;"
- In addition, some representatives are eligible for incentive or bonus compensation based on quantitative measures such as growth in assets under management, qualitative measures such as completion of professional development activities, or a combination of the two.

FCIS's compensation is "product agnostic," meaning that an FCIS representative earns the same percentage of revenue regardless of the source (for example - revenue generated from a mutual fund transaction versus a managed account fee is credited the same way).

FCIS representatives can only receive credit for revenue generated in accounts with a value of \$35,000 or greater. This does not establish a minimum account size for our retail customers but may create a conflict of interest since our representative has an incentive to encourage you to open an account with at least \$35,000 in assets, or to consolidate that amount of assets with us.

**Do you or your financial professionals have legal or disciplinary history?**

Yes, we have additional legal and disciplinary events. Visit [investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

For additional information about our brokers and services, visit [investor.gov/CRS](https://investor.gov/CRS) or [brokercheck.finra.org](https://brokercheck.finra.org), our website, and review your account agreement. For additional information on our advisory services, see our Form ADV on the Investment Advisors Public Disclosure site, on [Investor.gov](https://investor.gov), and refer to the brochures and supplements your financial professional provides.

**Conversation Starters:  
Ask Your Financial Professional**

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

To report a problem to the SEC, visit [investor.gov](https://investor.gov) or call the SEC's toll-free investor assistance line at (800) 732-0330. To report a problem to FINRA, visit [finra.org](https://finra.org) and select "File a Complaint" under "For Investors."

If you have a problem with your investments, account, or financial professional, contact us in writing at 100 E Tryon Rd, Mailcode DAC 19, Raleigh NC, 27603, Phone: 800-229-0205.

**Additional Information**

For additional information on our services, please refer to our New Account Application, our [Form ADV, Part 2A Brochure](#), or website at [firstcitizens.com](https://firstcitizens.com). If you would like additional, up-to-date information or a copy of this disclosure, please call 800-229-0205.

**Conversation Starters:  
Ask Your Financial Professional**

- Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?