

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

OMB Number: 3235-0049  
Expires: February 28, 2011  
Estimated Average burden  
Hours per response.....4.07

Name of Investment Adviser: Gama Global Investment Advisors, LLC					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
	One Market St. Spear Tower 36t	San Francisco	CA	94105	415-293-8121

**This part of FORM ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any government authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.

**FORM ADV**  
**Part II - Page 2**

Applicant: **Gama Global Investment Advisors,  
LLC**

SEC File Number:  
801- 71437

Date:  
5/05/10

- 1. A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)
- Applicant:**
- |   |  |    |   |
|---|--|----|---|
| <input checked="" type="checkbox"/> (1) | Provides investment supervisory services .....   | 43 | % |
| <input checked="" type="checkbox"/> (2) | Manages investment advisory accounts not involving investment supervisory services.....  | 42 | % |
| <input checked="" type="checkbox"/> (3) | Furnishes investment advice through consultations not included in either service described above...  | 15 | % |
| <input type="checkbox"/> (4)            | Issues periodicals about securities by subscription .....  |    | % |
| <input type="checkbox"/> (5)            | Issues special reports about securities not included in any service described above.....   |    | % |
| <input type="checkbox"/> (6)            | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... |    | % |
| <input type="checkbox"/> (7)            | On more than an occasional basis, furnishes advice to clients on matters not involving securities...   |    | % |
| <input type="checkbox"/> (8)            | Provides a timing service .....  |    | % |
| <input type="checkbox"/> (9)            | Furnishes advice about securities in any manner not described above.....   |    | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- B.** Does applicant call any of the services it checked above financial planning or some similar term? . . . . .
- |                          |                                     |
|--------------------------|-------------------------------------|
| Yes                      | No                                  |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- C.** Applicant offers investment advisory services for: (check all that apply)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input checked="" type="checkbox"/> (2) Hourly charges                          | <input type="checkbox"/> (5) Commissions       |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees)       | <input type="checkbox"/> (6) Other             |

- D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

- 2. Types of clients -** Applicant generally provides investment advice to: (check those that apply)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals                      | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations                    |
| <input checked="" type="checkbox"/> B. Banks or thrift institutions     | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input checked="" type="checkbox"/> C. Investment companies             | <input type="checkbox"/> G. Other (describe on Schedule F)   |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans |  |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)**

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities                                       | <input checked="" type="checkbox"/> H. United States government securities     |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                             | <input checked="" type="checkbox"/> I. Options contracts on:                   |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter                     | <input checked="" type="checkbox"/> (1) securities                             |
| <input checked="" type="checkbox"/> (3) Foreign issuers  | <input checked="" type="checkbox"/> (2) commodities                            |
| <input checked="" type="checkbox"/> B. Warrants  | <input checked="" type="checkbox"/> J. Futures contracts on:                   |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input checked="" type="checkbox"/> (1) tangibles                              |
| <input checked="" type="checkbox"/> D. Commercial paper  | <input checked="" type="checkbox"/> (2) intangibles                            |
| <input checked="" type="checkbox"/> E. Certificates of deposit                                 | <input checked="" type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities                                    | <input checked="" type="checkbox"/> (1) real estate                            |
| <input checked="" type="checkbox"/> G. Investment company securities:                          | <input checked="" type="checkbox"/> (2) oil and gas interests                  |
| <input checked="" type="checkbox"/> (1) variable life insurance                                | <input type="checkbox"/> (3) other (explain on Schedule F)                     |
| <input checked="" type="checkbox"/> (2) variable annuities                                     | <input type="checkbox"/> L. Other (explain on Schedule F)                      |
| <input checked="" type="checkbox"/> (3) mutual fund shares                                     |  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Charting               | (4) <input checked="" type="checkbox"/> Cyclical           |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |  |

B. The main sources of information applicant uses include: (check those that apply)

- |   |  |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services   |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities   | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission   |
| (4) <input type="checkbox"/> Corporate rating services                        | (7) <input checked="" type="checkbox"/> Company press releases                         |
|   | (8) <input type="checkbox"/> Other (explain on Schedule F)                             |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |   |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options,<br>uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)  |
| (4) <input checked="" type="checkbox"/> Short sales  |   |



Applicant: Gama Global Investment  
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**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ..... Yes ☒ No ☐

(If yes, please describe these standards on Schedule F)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☒ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- ☐ C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.. Yes ☐ No ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)**

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**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☐ E. Buys or sell for itself securities it also recommended to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes No  
☐ ☒

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory account, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Each client account is reviewed frequently and diligently by a principal of Gama Global Investment Advisors. Accounts are also reviewed at any interval the client requests and reviewed if any material change takes place in the account or the market in which the advisory client is invested.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Client reporting is provided by Schwab Institutional Group on a quarterly basis, monthly if there is activity in the account. Frequency of regular reports can be customized anytime by the client online at Schwab Institutional.

If custody and transactions are provided by someone other than Schwab Institutional, they will be provided by whichever firm is providing custody and transactions.



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**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |   |  |
|--|---|--|
| (1) securities to be bought or sold? .....           | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |
| (2) amount of securities to be bought or sold? ..... | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |
| (3) broker or dealer to be used? .....               | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
| (4) commission rates paid? .....                     | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ..... Yes ☒ No ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |   |   |  |
|---|---|--|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?..... Yes ☐ No ☒

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Gama Global Investment  
Advisors, LLC

SEC File Number:  
801- 71437

Date:  
5/05/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Gama Global Investment Advisors, LLC</b>		IRS Empl. Ident. No.: <b>27-1978731</b>
Item of Form (identify)	Answer	
1. A.(1) Advisory Services & Fees	Gama Global Investment Advisors charges fees based on assets under management and/or an hourly rate. Both are negotiated with a client.	
Annual Asset Based Fee Not More Than 2%	Gama Global Investment Advisors provides ongoing investment supervisory services to its clients for a negotiated annual fee of not more than 2% of assets under management. The annual fee will be deducted from the clients account on a quarterly basis. Client will receive a prorated refund should the advisory contract be terminated prior to its expiration.	
1. A.(2) Consultations and Hourly Fees	<p>Gama Global Investment Advisors may also charge an hourly rate for consultations and other investment advice at a minimum hourly rate of \$300 per hour. The fees will be invoiced to the client on a monthly basis as services are rendered.</p> <p>Gama Global Investment Advisors conducts an initial consultation and gathers information to assist the investment advisory client in determining specific needs, goals, objectives, and tolerance for risk. Gama Global then prepares an analysis of clients current financial situation and possible future scenarios as appropriate. Next, Gama Global Investment Advisors presents its analysis of significant observations, assumptions, and its recommendations to the investment advisory prospect or client.</p>	
5. Education and Business Standards	All those involved with determining or giving investment advice to clients have college degrees, appropriate licenses and registrations, and investment experience. Background checks are performed on all those determining or giving investment advice.	

(Complete amended pages in full, circle amended items and file with execution page (page 1)).



**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Gama Global Investment  
Advisors, LLC

SEC File Number:  
801- 71437

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5/05/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Gama Global Investment Advisors, LLC</b>		IRS Empl. Ident. No.: <b>27-1978731</b>
Item of Form (identify)	Answer	
6. Education & Business Background of Advisers  Jay Dean Tinney	<p>Mr. Tinney has over 25 years experience in the securities industry. He is the Founder and Managing Member of Gama Global Investments and Gama Global Investment Advisors. Gama Global is named after Vasco de Gama, the Portuguese explorer. Gama Global Investments is a FINRA registered broker/dealer and a member of SIPC. Gama Global Investments is a placement agent and investment banker whose clients have committed close to \$2,000,000,000 USD to leading sponsors of private equity, venture capital, and hedge funds. Mr. Tinney is currently registered with FINRA as a General Securities Representative, an Investment Adviser, an Investment Banker, a General Securities Principal, and a Financial Operations Principal. He has previously held FINRA registrations as a Registered Options Principal and Municipal Bond Principal.</p> <p>In addition to managing the investment banking and investment advisory of Gama Global, he continues to write, teach, and lecture on securities industry topics. He has been published in many local newspapers and nationally in the Wall Street Journal. Over the last 25 years, thousands of securities professionals have attended his lectures and workshops. He has been hired to tutor senior management at many leading financial firms including, but not limited to BlackRock, TPG Capital, The Carlyle Group, Wells Fargo, Cargill, and Charles Schwab. He has led business simulations and team building exercises at Goldman Sachs, Citibank, and UBS. He has designed, hosted and delivered classes on alternative investments for a foreign central bank. He also advised that foreign government on the establishment of their sovereign wealth fund and their U.S. investments.</p> <p>Mr. Tinney was born in 1962 in Compton, California and is the graduate of Arizona State University. He holds a Bachelor's Degree in English, with minors in History and Philosophy.</p>	
Michelle Kleier	<p>Ms. Kleier has been a financial professional for the last 15 years. She was an instructor for Kaplan Financial teaching securities review courses and most recently served as the Chief Financial Officer for a bio-tech company. She was also the Director of Finance and Administration for a public company in the travel industry. She has been associated with Gama Global Investments as its Chief Operating Officer since its inception and is also the Chief Operating Officer for Gama Global Investment Advisors. Ms. Kleier is currently registered with FINRA as a General Securities Representative, an Investment Adviser, an Investment Banker and a General Securities Principal.</p> <p>Ms. Kleier was born in 1967 in San Francisco where she has lived for the past 18 years. She is a graduate of The University of California, Santa Barbara and holds a Bachelor's Degree in French. She is also a graduate of The Monterey Institute of International Studies and holds a MBA in International Finance.</p>	

(Complete amended pages in full, circle amended items and file with execution page (page 1)).



**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Gama Global Investment  
Advisors, LLC

SEC File Number:  
801- 71437

Date:  
5/05/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Gama Global Investment Advisors, LLC</b>		IRS Empl. Ident. No.: <b>27-1978731</b>
Item of Form (identify)	Answer	
7. A. & C. Other Business Activities	Jay Dean Tinney and Michelle Kleier are the Managing Member and Chief Operating Officer respectively, of both Gama Global Investment Advisors and Gama Global Investments. Their time is divided equally between both entities and the two entities share the same office space. Gama Global Investment Advisors and Gama Global Investments are under common control. Both are 100% owned by GGI Bay Holdings and 100% of GGI Bay Holdings is owned by Jay Dean Tinney.	
8. A. Other Financial Industry Activities or Affiliations	Gama Global Investments is a broker/dealer that acts exclusively as a placement agent and investment banker. The broker/dealer is registered with the SEC and FINRA. The broker/dealer will not provide custody or transactions for the investment advisory clients. Custody and transactions for the investment advisory is provided by Schwab Institutional Group.	
9. D. Participation or Interest in Client Transactions	If the investment advisory client is an accredited investor and if the investment is suitable, they may participate in the placement agent or investment banking transactions of Gama Global Investments. These transactions will not be done on a discretionary basis and the fees and conflicts of interest in the transaction will be disclosed and acknowledged in written form by the investment advisory client.	
13. A. Additional Compensation	Investment advisory clients may invest in private equity, venture capital, and hedge funds for which Gama Global Investments acts as a placement agent. They may also participate in Gama Global's investment banking transactions. These transactions will not be done on a discretionary basis and the fees and conflicts of interest in the transaction will be disclosed and acknowledged in written form by the investment advisory client.	

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Gama Global Investment  
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Date:  
5/05/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

**Gama Global Investment Advisors, LLC**

IRS Empl. Ident. No.:  
**27-1978731**

Item of Form (identify)	Answer
Gama Global Investment Adviosrs Code of Ethics	<p>Gama Global Investment Advisors Code of Ethics is intended to reflect the fiduciary standards that govern the conduct of Gama Global Investment Advisors employees in compliance with the Investment Advisers Act of 1940. It establishes the responsibilities and disclosures in providing investment advice to our advisory clients.</p> <p>Gama's Code of Ethics establishes a standard of conduct between the firm, its employees, and its advisory clients. It includes compliance with laws, rules, and regulations. Some of the topics covered in Gama's Code of Ethics include the protection of material, non-public information and the personal securities trading of its employees. Specific information and guidance for Gama's Code of Ethics is also provided in Gama Global's written supervisory control procedures.</p> <p>All employees of Gama Global Investment Advisors are also employees of Gama Global Investments. Gama Global Investments is a SEC/FINRA registered broker/dealer. All Gama Global Investments employees must also comply with the FINRA Code of Conduct, FINRA rules and regulations, as well as the higher ethical fiduciary standards of the Investment Advisers Act of 1940.</p> <p>A copy of Gama Global Investment Advisors Code of Ethics will be provided to any client or prospective client upon request.</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1)).



**Schedule F of  
FORM ADV  
Continuation Sheet for Form ADV Part II**

Applicant:  
Gama Global Investment  
Advisors, LLC

SEC File Number:

801- 71437

Date:

5/05/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Gama Global Investment Advisors, LLC

IRS Empl. Ident. No.:

27-1978731

Item of Form  
(identify)

Answer

Gama Global  
Investment  
Advisors  
Privacy Policy

All non-public information exchanged between the investment advisory client and Gama Global Investment Advisors, shall be treated as confidential. Personal information shall not be disclosed without the written consent of the advisory client. Each Gama Global Investment Advisory employee acknowledges in writing their understanding of the privacy and confidentiality policies and the consequences of unauthorized disclosure. The exception to this privacy policy is disclosures required by law.

(Complete amended pages in full, circle amended items and file with execution page (page 1)).