

# **Global Access Investment Advisor, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: September 19, 2011**

This Disclosure Brochure provides information about the qualifications and business practices of Global Access Investment Advisor, LLC (“Global Access”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (212) 397-0555.

Global Access is a Registered Investment Advisor with the State of New York. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Global Access to assist you in determining whether to retain the Advisor.

Additional information about Global Access and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Material Changes

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On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the “Advisers Act”). The amendments are designed to require a Registered Investment Advisor to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor’s business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts: *Part 2A and Part 2B*.

*Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of Global Access.

Global Access believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Initial Filing

Global Access is a new Registered Investment Advisor. This is the initial filing of the Disclosure Brochure.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Global Access.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for Global Access:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **126900** (our firm’s CRD number) in the field labeled “Firm IARD / CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (212) 397-0555.

## Item 3 – Table of Contents

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Global Access Investment Advisor, LLC (“Global Access” or the “Advisor”) is a Registered Investment Advisor with the State of New York, which is organized as a Limited Liability Company (“LLC”) under the laws of the State of New York. Global Access was founded in 1999 serving a limited client base and commenced activities as a registered investment advisor in 2011. Global Access is owned by Raquel M. Borges, President. The Chief Investment Advisor is Jan C. Landi. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Global Access.

### **B. Advisory Services Offered**

Global Access offers investment advisory services to several types of clients including individuals, high net worth individuals, trusts, estates, businesses and private funds. Clients are located in New York, other U.S. states and outside the U.S. (each referred to as a “Client”).

#### Account Portfolio Management

Global Access provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. Global Access works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. Global Access will then construct a portfolio, consisting exchange-listed securities, real estate investment trusts, limited partnerships, and options. The Advisor may also utilize individual stocks and bonds to meet the needs of its Clients.

Global Access’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Global Access will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Global Access evaluates and selects investments for inclusion in Client portfolios only after applying their internal due diligence process. Global Access may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Global Access may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Global Access may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

**Prior to rendering investment advisory services, Global Access will ascertain, in conjunction with the Client, the Client’s financial situation, risk tolerance, and investment objective[s].**

Global Access will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Global Access accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

#### Selection of Other Advisors

Global Access may periodically recommend and refer clients to unaffiliated money managers or investment advisors at Global Access’s discretion or Client’s request. Through this arrangement, the Client will then enter into an advisory agreement with that sub-advisor to which that sub-advisor will assist and advise the Client in establishing investment objectives and develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such sub-advisor services, the sub-advisor will receive an investment advisory fee, billed based on the fee schedule the Client establishes with the unaffiliated money manager[s] or investment advisor[s].

### Selection of Other Advisors - continued

Global Access will receive a portion of the investment advisory fee for the solicitation and referral of the Client to the sub-advisor, and may assist the Client in completing their Client questionnaire and account opening paperwork. Global Access may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship.

The Client, prior to entering into an agreement with unaffiliated money manager[s] or investment advisor[s], will be provided with the advisor's Form ADV 2 (or a brochure that makes the appropriate disclosures).

### **C. Client Account Management**

Prior to engaging Global Access to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – Global Access, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – Global Access will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Global Access will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Global Access will provide investment management and ongoing oversight of the Client's portfolio and overall account.

### **D. Wrap Fee Programs**

Global Access does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Global Access.

### **E. Assets Under Management**

Global Access is a newly registered advisor. As of the date of this report (September 19, 2011), the Advisor has one client with discretionary assets under management totaling \$60,000,000. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Global Access and the Client.

### **A. Fees for Advisory Services**

#### Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Investment Advisory Fees range from 2.00% to 0.50% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Investment Advisory Fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Global Access will be independently valued by the designated Custodian. Global Access will not have the authority or responsibility to value portfolio securities.

### Selection of Other Advisors

For Clients referred to an unaffiliated investment advisor, the Client's fee will be deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee will be provided to Global Access. Please see Item 14 for additional details.

### **B. Fee Billing**

#### Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Global Access at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Global Access to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Global Access, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by Global Access is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Global Access for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Global Access, but would not receive the services provided by Global Access which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Global Access to fully understand the total fees to be paid.

### **D. Advance Payment of Fees and Termination**

#### Account Portfolio Management

Global Access is compensated for its services in advance the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with Global Access, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the [quarter/month]. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

#### Unaffiliated Money Management

In the event that a Client should wish to terminate their relationship with an unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. Global Access will assist the Client with the termination and transition as appropriate.

### **E. Compensation for Sales of Securities**

Global Access does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.



## **Item 6 – Performance-Based Fees**

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Global Access does not charge performance-based fees for its investment advisory services. The fees charged by Global Access are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Global Access does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

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Global Access provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Pension and Profit Sharing Plans – retirement plan sponsors or company plans
- Foundation and Endowments – non-profit organizations that manage a pool of assets, and distribute funds according to a mandate or mission
- Corporations and Businesses – taxable business entities, investing cash reserves
- Other Financial Service Firms – other investment advisors or private funds

The relative percentage each type of Client is available on Global Access's Form ADV Part 1. These percentages will change over time. Global Access generally requires a minimum account size of \$500,000 to effectively implement its investment process. Accounts are grouped for calculating fees and determining minimums. The Advisor may waive or reduce the minimum account size at its sole discretion.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

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### **A. Methods of Analysis**

Global Access primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Global Access is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, Global Access generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Global Access will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Global Access may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Global Access will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

## **B. Risk of Loss - continued**

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Global Access may use margin in Client accounts for to manage the timing of purchases and sales, as appropriate. Global Access may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Global Access's investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with Options, Margin and Short-Sale transactions:

### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

### Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

### Market Risk

The price of a mutual fund, variable annuity sub-account or security may decrease in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a securities particular underlying circumstances.

### Fundamental Analysis

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process is included in Item 13.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (212) 397-0555.**



## Item 9 – Disciplinary Information

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There are no legal, regulatory or disciplinary events involving Global Access or any of its employees. Global Access and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter 126900 in the field labeled “Firm IARD/CRD Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Jan C. Landi by selecting the Investment Adviser Representative and entering Mr. Landi’s Individual CRD# 5727964 in the field labeled “Individual CRD Number”.

## Item 10 – Other Financial Activities and Affiliations

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The sole business of Global Access and Mr. Landi is to provide investment advisory services to its Clients. Neither Global Access nor its advisory personnel are involved in other business endeavors. Global Access does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client’s accounts.

## Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

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### A. Code of Ethics

Global Access has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Global Access. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Global Access and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Global Access associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Global Access has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (212) 397-0555.

### B. Investment Recommendations Involving a Material Financial Interest

Global Access does not recommend any investment in which Global Access or Mr. Hviid has a financial interest.

### C. Personal Trading and Conflicts of Interest

Global Access allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. The Advisor may have an incentive to favor its personal portfolio over a Client’s and could spend time managing personal assets instead of focusing on the Client’s assets. In addition, the Advisor may have incentive to purchase or sell securities for its portfolio in advance of trading for a Client. The Advisor understands its fiduciary duty and as such always places Client interests above its own interests and will never complete any transactions that favor the Advisor over the Client.

As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you. **At no time, will Global Access or any associated person of Global Access, transact in any security to the detriment of any Client.**

### D. Timing of Security Trades and Conflicts of Interest

At no time, will Global Access or any associated person of Global Access, transact in any security in advance of trades for a Client account that will present a conflict of interest or detriment to any Client.

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Global Access does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize Global Access to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, Global Access does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Global Access does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by Global Access. Global Access may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. Global Access does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Following are additional details regarding the brokerage practices of the Advisor:

1. **Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Global Access does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
2. **Brokerage Referrals** - Global Access does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
3. **Directed Brokerage** - Global Access will place trades within the established account[s] at the custodian designated by the Client. Clients are required to designate a custodian, under no circumstances will the Advisor will not select the custodian. Further, all Client accounts are traded within their respective brokerage account[s], unless otherwise directed in writing by the Client. Not all Advisors require Clients to direct brokerage to a specific custodian. In a relationship where the Client directs brokerage to a specific custodian, the Advisor is unable to achieve the most favorable execution, which may result in higher costs to the Client. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]).

Global Access does not seek competitive bids on securities transactions on a trade-by-trade basis and does not negotiate the transaction costs with the designated custodian. These costs are determined by the Client's designated custodian and are typically based on the size of the Client's account[s] and/or the overall relationship between the Advisor and the designated custodian. When recommending custodian[s] to Clients, the Advisor considers whether the custodian will reasonably provide best execution to the Client. Global Access will review the designated custodian's ability to provide best execution to Clients at least annually.

### B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Global Access will execute its transactions through an unaffiliated broker-dealer selected by the Client. Global Access may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by Mr. Landi, Chief Investment Advisor of Global Access. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Global Access if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 - Client Referrals and Other Compensation**

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### **A. Compensation Received by Global Access**

Global Access is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Global Access does not receive commissions or other compensation from product sponsors, broker dealers or any unrelated third party. Global Access may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Global Access may receive referrals of new Clients from a third-party.

### **B. Client Referrals from Solicitors**

Global Access does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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Global Access does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Global Access to utilize that custodian for the Client's security transactions. Clients will receive account statements from the Custodian at least quarterly. Clients should review the statements received by the Custodian and compare to information provided by Global Access to ensure all information is accurate. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 – Investment Discretion**

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Global Access generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Global Access. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Global Access will be in accordance with each Client's investment objectives and goals.

## Item 17 – Voting Client Securities

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Global Access does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements and supporting information directly from the Custodian. If questions arise, Global Access may assist in answering questions, but cannot accept proxy-voting responsibility.

## Item 18 – Financial Information

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Neither Global Access, nor its management has any adverse financial situations that would reasonably impair the ability of Global Access to meet all obligations to its Clients. Neither Global Access, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Global Access is not required to deliver a balance sheet along with this Disclosure Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

## Item 19 – Requirements for State Registered Advisors

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### A. Educational Background and Business Experience of Principal Officer

The President of Global Access Investment Advisor, LLC is Raquel M. Borges. The Chief Investment Advisor and Chief Compliance Officer of Global Access is Jan C. Landi.

#### Raquel M. Borges

Ms. Borges has served as the President of Global Access Investment Advisor, LLC (New York) and Global Access Consultoria Financeira (Sao Paulo Brazil) since 1999. Ms. Borges received a Bachelor's Degree in Law from MacKenzie University (Sao Paulo, Brazil – 1991) and passed the bar exam in 1992.

#### Jan C. Landi

Mr. Landi serves as the Chief Investment Advisor and Chief Compliance Officer of Global Access Investment Advisor, LLC. Mr. Landi is dedicated. Mr. Landi has served with Global Access Investment Advisor, LLC since 2001.

### B. Other Business Activities of Principal Officer

Mr. Landi is dedicated to the investment advisory activities of Global Access's Clients. Mr. Landi does not have any other business activities.

### C. Performance Fee Calculations

Global Access does not charge performance-based fees for its investment advisory services. The fees charged by Global Access are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

### D. Disciplinary Information

*There are no legal, civil or disciplinary events to disclose regarding Global Access its advisory persons.* Neither Global Access nor its advisory persons have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Global Access or its advisory persons.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and / or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Global Access or its advisory persons.*

### E. Material Relationships with Issuers of Securities

Neither Global Access nor its advisory persons has any relationships or arrangements with issuers of securities.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jan C. Landi  
Chief Investment Advisor  
Chief Compliance Officer**

**Effective: September 19, 2011**

This Brochure Supplement provides information about the background and qualifications of Jan C. Landi. (CRD# 5727964) in addition to the information contained in the Global Access Investment Advisor, LLC ("Global Access" or the "Advisor" - CRD #126900) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the Global Access Disclosure Brochure or this Brochure Supplement, please contact us at (212) 397-0555.

Additional information about Mr. Landi is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

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The Chief Investment Advisor and Chief Compliance Officer of Global Access is Jan C. Landi. Mr. Landi, born in 1966, is a dedicated Portfolio Manager for Client accounts of Global Access. Mr. Landi has served with Global Access Investment Advisor, LLC since 2001.

## **Item 3 – Disciplinary Information**

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Landi.* Mr. Landi has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Landi.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and / or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Landi.*

However, we do encourage you to independently view the background of Mr. Landi on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 5727964 in the field labeled "Individual CRD Number".

## **Item 4 – Other Business Activities**

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Mr. Landi is a dedicated to the investment advisory activities of Global Access's Clients. Mr. Landi does not have any other business activities.

## **Item 5 – Additional Compensation**

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Mr. Landi is a dedicated to the investment advisory activities of Global Access's Clients. Mr. Landi does not receive any additional forms of compensation.

## **Item 6 – Supervision**

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Mr. Landi serves as the Chief Investment Advisor and Chief Compliance Officer of Global Access. Mr. Landi can be reached at (212) 397-0555. Global Access has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Global Access. Further, Global Access is subject to regulatory oversight by various agencies. These agencies require registration by Global Access and its employees. As a registered entity, Global Access is subject to examinations by regulators, which may be announced or unannounced. Global Access is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Item 7 – Requirements for State Registered Advisors**

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Mr. Landi does not have any additional information to disclose.



## Privacy Policy

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Effective: September 19, 2011

### Our Commitment to You

Global Access Investment Advisor, LLC ("Global Access") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Global Access (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Global Access provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

### Information About You That Global Access Shares

Global Access works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Global Access's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

**To repeat, we do not sell your non-public personal information to anyone.**

### Information About Former Clients

Global Access does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

**Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

**We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (212) 397-0555.