

**ITEM 1 – COVER PAGE**

DELTA GLOBAL ASSET MANAGEMENT  
579 MAIN STREET  
BOLTON, MASSACHUSETTS 01740  
(978) 779-6947  
[WWW.BOLTONSECURITIES.COM](http://WWW.BOLTONSECURITIES.COM)

MARCH 31, 2011

This Brochure provides information about the qualifications and business practices of Delta Global Asset Management. If you have any questions about the contents of this Brochure, please contact us at (978) 779-6947. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Delta Global Asset Management is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Delta Global Asset Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 – MATERIAL CHANGES**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated March 31, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Martha Moore, President at (978) 779-6947 or [mmoore@boltonsecurities.com](mailto:mmoore@boltonsecurities.com). Our Brochure is also available on our web site [www.boltonsecurities.com](http://www.boltonsecurities.com), also free of charge.

Additional information about Delta Global Asset Management (“DGAM”) is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with DGAM who are registered, or are required to be registered, as investment adviser representatives of DGAM.

### **ITEM 3 – TABLE OF CONTENTS**

ITEM 1 – COVER PAGE .....	1
ITEM 2 – MATERIAL CHANGES .....	2
ITEM 3 – TABLE OF CONTENTS .....	3
ITEM 4 – ADVISORY BUSINESS .....	4
ITEM 5 – FEES AND COMPENSATION.....	5
ITEM 6 – PERFORMANCE BASED FEES AND SIDE-BY SIDE MANAGEMENT.....	6
ITEM 7 – TYPES OF CLIENTS..... ..	6
ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS....	7
ITEM 9 – DISCIPLINARY INFORMATION.....	8
ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	8
ITEM 11 – CODE OF ETHICS..... ..	9
ITEM 12 – BROKERAGE PRACTICES.....	10
ITEM 13 – REVIEW OF ACCOUNTS.....	11
ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION.....	11
ITEM 15 – CUSTODY..... ..	11
ITEM 16 – INVESTMENT DISCRETION.....	11
ITEM 17 – VOTING CLIENT SECURITIES.....	12
ITEM 18 – FINANCIAL INFORMATION .....	12

## **ITEM 4 – ADVISORY BUSINESS**

### **A. Description of Advisory Business**

DGAM is a SEC registered investment adviser and has been offering investment advisory services since 2002. DGAM is a privately owned corporation with its principal place of business in Bolton, Massachusetts. Bolton Financial Group owns ninety-five (95%) of the firm's equity and Martha Moore, President of DGAM, owns five (5%) of firm's equity. Please note that SEC registration does not imply a certain level of skill or training.

### **B. Types of Advisory Services**

DGAM offers both discretionary and non-discretionary asset management to separately managed accounts.

#### **Discretionary Asset Management**

DGAM manages investment advisory accounts on a discretionary basis according to methodology described in Item 8 – Investment Strategies, Methods of Analysis and Risk of Loss. DGAM will provide asset management services to the client guided by the client's investment objectives. If a client chooses to participate in discretionary asset management, the client will grant DGAM discretionary authority to manage the client's account. This authorization includes which securities to buy and sell, when to buy and sell securities and in what amounts, without obtaining prior the client's prior consent or approval. The client may limit DGAM's discretionary authority by providing DGAM with restrictions and guidelines in writing.

#### **Non-Discretionary Asset Management:**

DGAM manages investment advisory accounts on a non-discretionary basis and DGAM may only trade in the client's account subsequent to direct dialogue with the client. If a client chooses to participate in non-discretionary asset management, DGAM will provide investment management advice to the client through communication with client based upon the goals and objectives of the client.

### **C. Tailored Relationships**

DGAM tailors its advisory services to the individual needs of its clients. Advisory clients may impose restrictions on its accounts. DGAM may accept any reasonable limitation or restriction that clients wish to place on their account. All limitations and restrictions must be provided to DGAM in writing.

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

DGAM offers wrap accounts managed by third party investment managers on a discretionary basis. Currently, DGAM has arrangements with Fundquest, Lockwood Asset Management, Diastole Wealth Management and Envestnet Asset Management ("Sponsors") to offer the Sponsors' asset management platforms and to offer access to investment managers on the platforms. In certain instances, DGAM may act solely a referring adviser and the Sponsor will act as the client's investment adviser. In other instances, DGAM may as the client investment adviser by assisting the client in selecting investment managers and setting asset allocations. DGAM may also offer such services or access to investment

managers through other sponsors in the future. DGAM receives a portion of the total wrap fee for referring the client to the program or assisting in the selection of managers and setting asset allocations.

DGAM is also the sponsor of a wrap fee program managed on a discretionary or nondiscretionary basis by DGAM investment adviser representatives. There is no difference in the investment management of wrap accounts and separately managed accounts. DGAM receives a portion of the total wrap fee for providing investment management services

E. Assets Under Management

As of December 31, 2010, DGAM managed \$387,475,326.00 on a discretionary basis and \$126,558,258.00 on a non-discretionary basis.

**ITEM 5 – FEES AND COMPENSATION**

A. Advisory Fees and Compensation

Fees may vary and are generally negotiable depending upon variables such as the specific nature of services rendered, the complexity of a client's investment management needs, and/or the value of a client's assets under management. The maximum fee that may be charged to the client is as follows:

<u>Assets Under Management</u>	<u>Maximum Asset Based Fee</u>
On the first \$500,000	2.5%
On the next \$500,000	2.25%
On the next \$1,000,000	2.0%
On the next \$3,000,000	1.75%
Amounts over \$5,000,000	1.5%

The specific manner in which fees are charged by DGAM is established in a client's written agreement with DGAM. DGAM will generally bill its fees on a quarterly basis and clients are billed in at the start of each calendar quarter. Fees will be deducted from the client's account by the client granting DGAM authorization to directly debit fees from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

DGAM's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to DGAM's fee, and DGAM shall not receive any portion of these commissions, fees, and costs.

At its discretion, DGAM may consider a client's request for an alternative fee arrangement. In addition, DGAM reserves the right to change its fee schedule for all clients or selected clients for any reason. Clients will be given thirty (30) days advance notice before there is a change to the fee schedule. If the client agrees to a change in the fee schedule, the change will not become effective until the later of thirty (30) days after client is sent notice of the change or the beginning of the next billing quarter after the client is sent notice of the change.

DGAM or the Client may terminate their advisory agreements at any time upon thirty (30) days written notice. When the contract is terminated, fees will be billed on a pro rata basis calculated from the beginning of the quarter that the contract is terminated. Upon termination, any prepaid asset-based fees will be promptly refunded to the client on a prorated basis if the relationship is terminated before the end of a quarter. Client may also terminate relationship within five (5) business days of executing an investment management agreement without incurring any penalty or fees.

Item 12 further describes the factors that DGAM considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g. commissions).

#### Other Compensation:

Certain investment adviser representatives of DGAM are also registered representatives of Delta Services Corporation ("Delta"), an affiliated broker-dealer. These DGAM investment representatives may receive selling compensation from such broker-dealer for the facilitation of certain securities transactions on Client's behalf through Delta. The selling compensation received by the investment representative does not constitute a significant portion of compensation received from advisory clients. This arrangement presents a conflict of interest and may give the investment adviser representative incentive to recommend investment products based on the compensation received, rather than the client's needs. DGAM monitors the receipt of selling compensation by its representatives to identify potential conflicts of interest.

### **ITEM 6 – PERFORMANCE BASED FEES AND SIDE-BY SIDE MANAGEMENT**

DGAM does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

### **ITEM 7 – TYPES OF CLIENTS**

DGAM provides asset management services to individuals, high net worth individuals, banks, trusts, estates and charitable organizations, corporate pension and profit-sharing plans, and institutions. DGAM is also retained by investment management firms to provide investment advice with respect to investment vehicles.

## ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

DGAM employs the following investment strategies:

1. DGAM offers customized investment supervisory services structuring and maintaining portfolios of financial assets, appropriate to the specific client needs and objectives, and consistent with an assumed universal desire to minimize taxes. Such assets generally are concentrated in broadly diversified portfolios of common stocks of high-quality, growth companies and are monitored closely to ensure the securities continue to conform to the desired standards of diversification, quality, and potential for growth. Investing in securities involves risk of loss that the client should be prepared to bear.
2. DGAM's advisor representatives structure a client's portfolio using common stocks, mutual funds, fixed income investments or exchange traded funds based upon client's objectives and needs. In addition, advisor representatives monitor the investment portfolio and make recommendations for appropriate investments or asset allocations based on client's investment objectives, needs and in recognition of the inherent risks of investing in the financial markets. DGAM employs fundamental and technical analysis to meet client's short-term and long-term financial goals and objectives. Investing in securities involves risk of loss that the client should be prepared to bear.
3. DGAM provides general investment services using fundamental and technical analysis to meet client's short-term and long-term financial goals and objectives. DGAM's investment adviser representatives structure a client's portfolio using common stocks, mutual funds, fixed income investments or exchange traded funds based upon client's objectives and needs. In addition, advisor representatives monitor the investment portfolio and make recommendations for appropriate investments or asset allocations based on client's investment objectives, needs and in recognition of the inherent risks of investing in the financial markets. Investing in securities involves risk of loss that the client should be prepared to bear.
4. Registrant provides investment supervisory services by allocating client's investment management assets among various mutual fund classes in accordance with the client's investment needs and objectives. Investing in securities involves risk of loss that the client should be prepared to bear.
5. DGAM provides discretionary investment management services by offering a managed active trading strategy to client's which follows certain trading guidelines to generate income for the client and pursue a capital appreciation strategy. DGAM's investment advisor representatives utilize research from various sources in choosing fixed income securities. In addition, DGAM's investment advisor representative conducts fundamental analysis on companies associated with the fixed income securities and conducts an analysis of financial statements of these companies. Preferred stocks maybe frequently exchanged to capture the dividend paid by the preferred stock while attempting to maintain the same default risk. Bonds are bought and sold in the client's portfolio with an aim to strengthen the duration of the portfolio, increase the current yield and lower the risk of the portfolio. DGAM's investment advisor representative monitors the bonds in the client's portfolio for opportunities to purchase bonds of issuers currently held or bonds in a similar sector at a more advantageous price to further the goal of income capture and capital appreciation. This investment strategy involves the frequent trading of securities which may affect the investment performance particularly through increased brokerage and other transaction costs and taxes. Investing in securities involves risk of loss that the client should be prepared to bear.

## **ITEM 9 – DISCIPLINARY INFORMATION**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of DGAM or the integrity of DGAM's management. DGAM has no information applicable to this Item.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### Other Financial Industry Activities

DGAM is also a FINRA member broker-dealer, which operates under the name Bolton Securities Corporation. In addition, Bolton Securities has an introduction broker registration pending with National Futures Association.

### Affiliated Broker-Dealer

DGAM is affiliated with Delta Equity Services Corporation ("Delta"), a FINRA member broker-dealer. DGAM's principals and investment adviser representatives are also associated with Delta Equity Services Corporation. As affiliates, DGAM and Delta may offer investment programs in which Delta may provide certain services such as brokerage, custodial and execution services as introducing broker-dealer. This relationship may create a conflict of interest of interest to clients because DGAM's investment adviser representatives, who are also associated with Delta, may receive selling compensation from Delta. DGAM monitors the receipt of selling compensation to identify potential conflicts of interest.



## ITEM 11 – CODE OF ETHICS

DGAM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at DGAM must acknowledge the terms of the Code of Ethics annually, or as amended.

DGAM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which DGAM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which DGAM, its affiliates and/or clients, directly or indirectly, have a position of interest. DGAM's employees and persons associated with DGAM are required to follow DGAM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of DGAM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for DGAM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of DGAM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of DGAM's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between DGAM and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with DGAM's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. DGAM will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

DGAM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Martha Moore or Jane Mahle.

It is DGAM's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. DGAM will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

## ITEM 12 – BROKERAGE PRACTICES

### A. Directed Brokerage:

DGAM generally requires that a client direct brokerage transactions to Delta Equity Services Corporation (“Delta”) or Bolton Securities Corporation (“Bolton”) for execution. This may provide a financial benefit to DGAM’s personnel who are also registered representatives of Delta. This situation differs from other investment advisers that do not require its clients to direct brokerage transactions to a particular broker-dealer or to a broker-dealer where advisory personnel may have a financial interest in the brokerage commissions that clients pay. DGAM may be unable to achieve the most favorable execution of client transactions and this practice may cost the clients more money.

Factors that DGAM considers in recommending certain broker-dealers or custodians to clients may include such entity’s financial strength, reputation, execution, pricing, and service. In return for effecting securities transactions through certain broker-dealers/custodians, DGAM or certain of its representatives may receive certain support services that may assist DGAM in its investment decision-making process for all of DGAM’s clients.

As an investment advisory firm, DGAM has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather it appears to be collective considerations of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions of the market at the time the trade is placed, and the specific needs of the clients. DGAM seeks to obtain best execution for its clients’ transactions, which may not necessarily mean the best price or lowest commission available

DGAM may agree that a client may direct brokerage transactions to a broker-dealer other than Delta or Bolton. However, DGAM does not usually agree to this situation. DGAM generally will place orders with Delta or Bolton before placing orders with other broker-dealers to which clients have directed brokerage. This may result in a client receiving less favorable execution than clients executing transactions through Delta or Bolton.

### B. Trade Aggregation:

Generally, DGAM’s investment advisor representatives effect client transactions independently. DGAM representatives may, but are not required to, block or aggregate orders to allocate equitably among clients differences in prices that might have been obtained had such orders been placed independently. This blocking or aggregating technique must be equitable for each account. Block trading is performed when it is consistent with the duty to seek best execution. DGAM executes block transactions in a manner designed to ensure that no client is favored over any other client. Under this procedure, transactions will generally be averaged as to price and allocated among clients pro rata to the purchase and sale orders placed for each client on any given day. DGAM’s policy is to allow investment adviser representatives to engage in this technique when it’s consistent with the manner in which the particular representative conducts his or her investment advisory activities.

### **ITEM 13 – REVIEW OF ACCOUNTS**

Accounts are reviewed on a regular basis. In addition, each account is reviewed periodically to evaluate performance in the accounts against relevant benchmarks and determine if the investments remain consistent with the client's financial objectives and net worth. Accounts may be reviewed more frequently as necessary to respond to significant changes in the account.

Events that may trigger the further account reviews may include, but would not be limited to, a notable increase in the volume of requests by the client to effect transactions in the accounts, where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Other factors could be the performance on an individual account being an outlier to the performance of accounts with similar investment objectives and customer complaints.

Jane Mahle, Chief Compliance Officer, is responsible for the oversight of the account reviews, which are mainly performed by Ronald Fremault. Reviewers are provided with a set of instructions for performing account reviews. The instructions provided to the reviewers are used internally and the Registrant does not publish these instructions.

Clients receive reports of their investment holdings from the custodian of the account showing the current value of the positions, the change in value of the account from the previous period, as well as all transactions, dividends, account deposits and withdrawals.

Sponsors of third party investment managers used by Registrant generally provide the client with a quarterly report of account holdings, transactions, and investment performance.

### **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

If the client is introduced to the Registrant by a solicitor, Registrant may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940 as amended. Any such referral fee shall be paid solely from Registrant's investment management fee and shall not result in any additional charge to the client.

### **ITEM 15 – CUSTODY**

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. DGAM urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **ITEM 16 – INVESTMENT DISCRETION**

DGAM usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, DGAM observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, DGAM's

authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to DGAM in writing.

#### **ITEM 17 – VOTING CLIENT SECURITIES**

As a matter of firm policy and practice, DGAM does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. DGAM may provide advice to clients regarding the clients' voting of proxies.

#### **ITEM 18 – FINANCIAL INFORMATION**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about DGAM's financial condition. DGAM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.