



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

**Effective: September 17, 2012**

This Brochure provides information about the qualifications and business practices of Global Investment Management, LLC ("GIM"). If you have any questions about the contents of this Brochure, please contact us at (609) 452-2929.

Global Investment Management, LLC is a registered investment adviser registered with the Securities Exchange Commission. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an Investment Adviser does not imply any specific 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 Global Investment Management, LLC 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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The following brief summary discloses material changes made to this brochure since our last update in February 10, 2012.

1. Addition of pension consulting services
2. Addition of fee information relating to pension consulting services

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

### Future Changes

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

At any time, you may view the current Firm Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

To review the firm information for Global Investment Management, LLC,

- Click **Investment Adviser Search** in the left navigation menu and enter.
- Select the option for Investment Adviser Firm and enter **153677** (*our firm's CRD number*) in the field labeled "Firm IARD/CRD Number".
- ADV Part 1 will be displayed.
- This will provide access to Form ADV 1 and 2A.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions.
- On the left navigation, Form ADV Part 2A is located near the bottom.

You may also request a copy of this Firm Brochure at any time, by contacting us at (609) 452-2929 / (800) 637-9955.

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## **Item 4 - Advisory Services**

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### **A. Firm Information**

Global Investment Management, LLC ("GIM") is a registered investment advisor with the Securities Exchange Commission, which was organized as a limited liability corporation in the state of New Jersey in 2010. GIM is a successor of a continually operating registered investment advisor in Princeton NJ since 1983. Ram Kolluri, President & Chief Investment Officer of GIM co - founded Individual Asset Planning Corporation in 1983 with offices in Princeton and Morristown NJ. The Princeton office was spun off into a separate corporation as GlobalValue Investors, Inc. in 1997 with Ram Kolluri as the sole stockholder of the company. GlobalValue Investors, Inc. name was changed to Global Investment Management, Inc. in 2004. Global Investment Management, Inc. was acquired in 2008 by ICICI Securities Holdings Inc. a registered investment advisory firm - which in turn sold the business back to Ram Kolluri in 2010 - to be incorporated as GIM.

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

#### **Investment Management Services**

GIM provides investment management services to high net worth individuals, private family offices, pension plans, trusts, and foundations.

GIM helps its individual Clients (hereinafter "Private Clients") to identify their objectives, risk tolerance, time horizon, and their preference for liquidity. With this information, GIM helps its Private Clients develop a suitable written investment policy statement, taking the Client's stated preferences, their tax situation, and any other pertinent information into consideration.

GIM invests its Private Clients' portfolios primarily in equity Exchange-Traded Funds (ETFs), Exchange Traded Notes (ETNs), Structured Notes, individual company securities, individual bonds, stock and bond mutual funds, and bond ETFs. GIM uses the ETFs and mutual funds it uses to get the benefits of broad diversification in the U.S. and foreign markets at minimal cost to the Client. GIM primarily uses low-cost bond mutual funds and ETFs, but also uses individual securities in situations where they are most appropriate for the individual Client. GIM does not guarantee the appreciation in value of such securities during the investment time horizon stated in the investment policy.

Minimum account size for Investment Management Services is generally \$500,000.

#### **Financial Planning Services**

GIM provides comprehensive financial planning (as defined by the CFP Board of Standards) as a part of its investment supervisory services. All new Client engagements include a comprehensive financial data gathering meeting either in person or via phone. This data is reviewed by a qualified Certified Financial Planner (TM) the following areas:

- Income Tax Planning
- Cash Flow Planning
- Investment Planning
- Children's Education Planning
- Retirement Planning
- Estate Planning
- Risk Management & Insurance Planning

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GIM's initial financial planning recommendations may be either in oral or written form. The Client may choose to implement or reject the recommendations at any time. GIM offers to review the Client's financial condition from time to time as a part of its ongoing portfolio review meetings.

#### Advanced Financial Planning Consultation Services

Separately, GIM offers advanced financial planning consultation services such as investment supervision services to private family offices, business succession planning to closely held businesses, and pension and retirement planning to small businesses, implementation of qualified pension plans on a negotiated fee basis. Pension planning services are offered in consultation with qualified attorneys, actuaries, and Third Party Administrators, and employee education in connection with 401 (k) plans etc. GIM does not prepare tax returns or render legal or tax opinion at any time in connection with offering the above mentioned services. Clients are pro-actively encouraged by GIM to seek competent legal and tax advice where appropriate. GIM fee, in these circumstances, is negotiated at the beginning the engagement and is fully disclosed to the Client at all times. Clients are separately responsible for all costs associated with obtaining legal and tax advice.

In performing its services, we entrust that the Client will provide accurate information and GIM will not be obligated to verify any information received from the Client or from the Client's other professionals. If requested by the Client, we may recommend the services of other professionals for purposes of implementing the plan. The Client is under no obligation to engage the services of any such recommended professional. GIM does not receive any compensation from these professionals for recommending their services. Clients are advised that it remains their responsibility to promptly notify GIM if there is ever any change in their financial situation during the financial planning process.

It is the Client's responsibility to notify us promptly of any material change to the information provided by the Client, including any change to any investment objectives, risk tolerance, investment time horizon, and any investment policies, guidelines or reasonable restrictions. We will honor Client restrictions unless those restrictions impair our ability to manage Client assets.

**Prior to rendering investment management services, GIM will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective(s).**

#### Pension Consulting Services

GIM offers the following fiduciary pension consulting services to retirement plan sponsors ("Client"):

1. General plan design consulting.
2. Assist the Client and its fiduciaries to meet their fiduciary responsibilities as investment fiduciaries pursuant to the Employee Retirement Income Security Act ("ERISA").
3. Assist the Client in the development of an investment policy statement (IPS). The IPS establishes the investment policies and the objectives of the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the investment policy statement.
4. Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404 (c) and the regulations there under.

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5. Provide non – discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan policies and objectives. Client shall have the final decision making authority regarding the initial selection, removal and addition of the investment options.
6. Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain or remove and replace investment options.
7. Meet with Client on a periodic basis to discuss the reports and the investment recommendations.
8. Provide non – discretionary investment advice to the Client with respect to the selection of a Qualified Default Investment Alternative (QDIA) for the participants that are automatically enrolled in the Plan or who otherwise fail to make an investment election. The Client retains the sole responsibility to provide all notices to the participants required under ERISA 404 (c) (5).
9. All retirement plan consulting services shall be in compliance with the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). Under such appointments, GIM acknowledges that we are a fiduciary within the meaning of Section 3(21) of ERISA.
10. The educational support and investment workshops will NOT provide individual Plan participants with individualized tailored investment advice or individualized, tailored asset allocation recommendations. GIM will not serve in the capacity of a “fiduciary advisor” as so defined under the Pension Protection Act of 2006.
11. GIM does not provide services generally provided by a record keeper, or a third party administrator or an actuary to a qualified retirement plan. Services provided to a Client will be specified in an agreement and we will disclose to the client any change to the information in the agreement required to be disclosed by our firm under ERISA Regulation Section 2550.408b-2(c)(1)(iv).
12. GIM will perform the Fiduciary Services in accordance with the prudent man rule set forth in ERISA Section 404 (a) (1) (B).

GIM offers the following non – fiduciary pension consulting services to retirement plan sponsors (“Client”):

1. Assist in the education of the participants in the Plan about general principle of retirement planning, savings and investing towards retirement, concepts asset allocation among various asset classes, controlling emotions and withstanding capital markets volatility, and understanding the investment alternatives that are available under the Plan. Client understands that Adviser’s assistance in participant retirement planning and investment education shall be consistent with and within the scope of (d) (i.e., the definition of investment education) of the Department of Labor Interpretive Bulletin 96-1. Investment Education shall include the following four types of information:
  - a. Information about the terms of the Plan and the benefits of participating in the Plan.
  - b. General information about retirement planning and general principles of investments

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- c. General information about the “target date” funds and aged based mapping to the funds (as Qualified Default Investment Alternatives as part of 404 (c) compliance) that are offered by the plan.
  - d. Explanation relating to educational tools that a participant can use to determine risk tolerance, perform gap analysis, and other similar interactive investment (computer or web based) materials.
- 2. Assist in the group enrollment meetings designed to increase retirement plan participation among employees and retirement planning and investment understanding by the employees.
- 3. Perform analysis of the fees and expenses associated with the investments and the service providers.
- 4. Perform provider searches and analysis of services provided by bundled providers, record keepers and other service providers.
- 5. Adviser will perform the Non – Fiduciary Services and shall not be liable for any liabilities and claims arising there under unless caused by Adviser’s intentional misconduct or gross negligence.

Client acknowledges that:

- 1. It has retained, and will exercise, final decision – making authority and responsibility for the implementation of any recommendations or advice rendered to the Client by GIM.
- 2. In performing the Non – Fiduciary duties, GIM is not acting as a fiduciary of the Plan as defined in ERISA.
- 3. In performing both Non – Fiduciary and Fiduciary Services, GIM does act as, nor has GIM agreed to assume the duties of, a trustee or the Plan Administrator, as defined under ERISA, and GIM has no discretion over the investment of Plan assets or to interpret the Plan documents, to determine eligibility or participation under the Plan, or to take any other action with respect to the management, administration or any other aspect of the plan.
- 4. GIM does not provide legal or tax advice.
- 5. Investments are subject to various market, political, currency, economic, and business risks and may not always be profitable; and further that GIM does not and cannot guarantee financial or investment results.
- 6. GIM may perform other services for other clients (such as Personal Choice Retirement Accounts or PCRA for participants in the Plan under a separate investment advisory agreement with GIM at their choice) on a fully disclosed basis, (ii) may charge a different fee for its PCRA clients, and that GIM, (iii) may give advice and take action that is different from the Plan investment selections etc.
- 7. GIM may, by reason of performing services for other clients, acquire confidential information, Client acknowledges and agrees that GIM is unable to divulge to the Client or any other party, or act upon, any such confidential information with respect to its performance under this agreement.

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8. GIM is entitled to rely upon all the information provided to GIM, whether financial or otherwise, from reputable third parties or by client, Client representatives or third - party services providers to the Client, the Plan, or GIM without independent verification. Client agrees to promptly notify GIM in writing any material changes in the financial and other information provided to GIM and to promptly provide any such additional information as may be requested by GIM.
9. GIM will not be responsible for voting proxies of the mutual funds held by the Plan (or it's Trust). The responsibility for voting proxies of investments held by the plan or its trust remain with the Client (or, if applicable, with the plan participants).

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

When providing Investment Management Services, GIM will work with each Client to determine and understand their unique circumstances, including their:

- Financial objectives
- Risk tolerance
- Time horizon
- Liquidity preferences
- Tax situation

We then develop a suitable written investment policy statement that reflects these circumstances and guides us in designing a customized investment strategy for each Client. Clients may request that certain restrictions be placed on their portfolio. We will typically honor these requests (and include them in the Client's Investment Advisory Agreement) so long as these restrictions do not impede our ability to effectively manage their portfolio.

With these strategic guidelines in place we determine an appropriate asset allocation for the Client and construct a portfolio utilizing:

- US and international equity (stock) Exchange-Traded Funds (ETFs)
- Exchange Traded Notes (ETNs)
- Structured notes
- Individual company stocks
- Individual fixed income securities (bonds)
- Stock and bond mutual funds
- Bond ETF's

GIM primarily employs ETFs and mutual funds so that our Clients are able to benefit from broad diversification in the U.S. and foreign markets at minimal cost. We also use individual securities (like stocks or bonds) in circumstances where they offer a better match with the objectives we are seeking to achieve.

Client accounts and investment selection is overseen by the Investment Committee. The Investment Committee is comprised of GIM senior staff members. The Investment Committee meets periodically to review current GIM investments, potential investments as well as deciding on general investment guidelines.

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

We do not participate in any wrap fee programs.

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## E. Assets Under Management

As of September 14, 2012, GIM manages the following assets\*:

Discretionary Assets	\$175,718,000
Non-discretionary Assets	\$0
<b>Total</b>	<b>\$175,718,000</b>

(Rounded to the nearest thousand dollars)

## Item 5 - Fees and Compensation

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The following section details the fee structure and compensation methodology for our services. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of GIM and the Client.

### A. Fees for Advisory Services

#### Investment Management Services

GIM provides Investment Management Services for Client portfolios on an individualized basis. GIM manages each portfolio to comply with their investment policy statement and Investment Advisory Agreement.

GIM bases its asset management fees on the market value of each Client's portfolio at the end of each calendar quarter utilizing the following schedule:

<b>Assets Under Management</b>	<b>Annual Rates</b>
Up to \$2 million	1.00%
Next \$3 million	0.75%
Next \$5 million	0.50%
All relationships over \$10 million (flat)	0.50%

Minimum Fee: GIM charges a minimum quarterly advisory fee of \$1,250 per Client relationship. Accounts relating to each client relationship are aggregated for fee calculation purposes.

#### Financial Planning Services

GIM financial planning services are rendered as a part of its investment management services at no extra cost to the Client. The Client may choose to utilize (or to not utilize) such services depending upon individual circumstances and suitability.

#### Advanced Financial Planning Consultation Services

GIM offers Advanced Financial Planning Consultation Services on a negotiated fee basis. These fees may be retainer-based or Clients may choose to be billed based on an hourly rate. These fees will be detailed in a contract between GIM and the Client.

#### Pension Plan Consulting Services

1. GIM annual Fees for Fiduciary Services shall be calculated as follows:

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- |                        |                              |
|------------------------|------------------------------|
| a. First \$3.0 Million | 0.60%                        |
| b. Next \$3.0 Million  | 0.50%                        |
| c. Next \$4.0 Million  | 0.40%                        |
| d. Over \$10.0 Million | 0.40% Flat fee on all assets |

## **B. Fee Billing**

### Investment Management Services

GIM's investment management fee is due and payable at the end of each calendar quarter. Services for periods less than a quarter are pro-rated based on the number of calendar days that GIM managed the Client's account. Fees are fully disclosed to the Client by way of the written agreement entered into with GIM.

The value of managed assets to calculate the fee will be based upon the market value of the Client's account at the end of each calendar quarter. To determine the quarter-end market values, GIM will use the asset values provided by the custodian.

Our Clients acknowledge and agree that investment management fees payable to GIM will either be automatically deducted from the Client's account or will be invoiced separately and this will be documented within the Investment Advisory Agreement between the Client and GIM. If fees are directly debited by the custodian it will have to be pre-agreed within the Investment Advisory Agreement, it will be disclosed directly to the Client within the monthly statement directly from the custodian, and a separate detailed written calculation of the fees will be provided quarterly by GIM to the Client.

### Advanced Financial Planning Consultation Services

Consulting fees are invoiced either monthly, bi-weekly or on a project basis no less frequently than quarterly, and compensation is only payable after all services have been provided. Fees are fully disclosed to the customer by way of the written agreement entered into with GIM. All consulting fees are negotiable. GIM may discount fees at its sole discretion

### Pension Plan Consulting Services

1. The annual fees are based upon the market value of the included assets (as reported by the Custodian or the Record Keeper). The initial fees will be the amount, prorated for the number of days remaining in the calendar quarter from the Effective Date of this Agreement, based upon the market value of the Plan assets on the last business day of the quarter. Thereafter, the fees will be based upon the market value of the Plan assets on the last business day of each calendar quarter, and payable upon submission of the invoice.
2. GIM charges a minimum annual fee of \$12,000 per plan.
3. If this Agreement is terminated prior to the end of a calendar quarter, GIM shall be entitled to a fee, prorated for the number of days in the fees period prior to the effective date of termination.

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

The above-referenced fees charged by GIM do not include brokerage commissions and other costs related to the execution of transactions on behalf of Clients. The Client will pay these costs in addition to the fees discussed above. The custodian discloses these fees in their disclosure documents, agreements, or the custodian's account-opening documents. Clients are also responsible for wire transfer fees, safe-keeping fees and other special services provided by the broker-dealer, transfer agent, or custodian. These fees are disclosed by the custodian at the time the Client opens his or her account(s) or when the service is requested.

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

Advance Fees – GIM's investment management fees are payable in arrears. Clients are not required to pre-pay fees at any time.

Termination – Clients may request to terminate their Investment Advisory Agreement with GIM, in whole or in part, by providing thirty (30) days advance written notice to GIM and delivering it to its offices during normal business hours. GIM will receive its investment management fee for services which were provided up to the termination of the contract. The Client is and shall remain responsible for any management fees due to third party money managers.

GIM will disclose any assignment of the Investment Advisory Agreement between GIM and the Client to another duly registered investment advisor in writing via a “negative consent” letter to the client prior to such assignment. The client may choose not to consent for such an assignment by informing GIM in writing within thirty days of the receipt of the letter. If the client does not communicate his / her objection in writing within thirty days, GIM will then assume that the client has positively consented for such assignment.

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

GIM does not receive any compensation based on the sale of securities.

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

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GIM does not charge performance-based fees. Our fees are based solely on Client assets under management. We do not share in our Clients' investment gains/losses or charge a contingent fee based upon Client's asset appreciation or gains.

## **Item 7 - Types of Clients**

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GIM provides advisory services to:

- High net worth individuals
- Private family offices
- Pension plans
- Trusts
- Foundations

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The relative percentage each client type currently represents is available on GIM's Form ADV Part 1. The actual mix of types of Clients changes over time based upon market conditions, business plans and other factors. GIM does not specialize in, or actively seek, any given client type. GIM is committed to providing services to qualified investors, regardless of legal or corporate status.

GIM provides customized services to meet the unique needs of each Client. Additional details are contained in Item 4 – Advisory Services.

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

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

GIM employs a combination of fundamental and technical analysis to make asset allocations decisions for its Clients. Fundamental analysis is the process of looking at economic and business indicators as investment selection criteria. By researching historical return and risk characteristics of various asset classes we seek to construct Client-specific portfolios that we believe will match their objectives and risk tolerance.

When selecting individual securities (stocks or bonds) we utilize fundamental analysis to gain an understanding of the overall strength and financial viability of the company under consideration.

We perform due diligence on independent investment managers when considering ETF's or mutual funds for Client portfolios. In selecting these managers we review:

- Relative performance compared to stated benchmarks and peer groups
- Manager reputation and experience
- Clarity of a stated investment philosophy
- Adherence to investment process and investment style
- Costs or fees associated with managing the ETF or mutual fund
- Any additional qualitative or quantitative factors we deem appropriate

### **B. Investment Strategies**

GIM offer customized investment strategies that are designed to meet the needs of a particular Client's investment objectives.

### **C. 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. We 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, liquidity needs, 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. GIM 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 us of any changes in financial condition, goals or other factors that may affect this analysis.

## Item 9 - Disciplinary Information

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GIM 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. Background information is available on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

To review the firm information for GIM, click **Investment Adviser Search** in the left navigation menu and enter, select the option for Investment Adviser Firm and enter **153677** (*our firm's CRD number*) 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.

**There are no legal, regulatory or disciplinary events involving GIM or any of its employees.**

## Item 10 - Other Financial Activities and Affiliations

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GIM does not engage in any financial activities beyond the services described in Item 4 - Advisory Services. We do not have any affiliations within the financial industry.

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

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### A. Code of Ethics

We have implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated within our firm. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. GIM and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of GIM associates to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principals, reporting personal securities trading, exceptions to reporting 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.

We have written our Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (609) 452-2929.

### B. Personal Trading and Conflicts of Interest

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. From time to time the interests of the principals and employees of GIM may coincide with those of a Client. Individual securities may be bought, held or sold by an officer or employee of GIM that are also recommended to or held by a Client. It is the policy of GIM to permit the firm, its employees and IARs to buy, sell and hold the same securities GIM also recommends to Clients. It is acknowledged and understood that GIM performs investment services for various Clients with varying investment goals, risk profiles and time horizons. As such, the investment advice may differ

between Clients and investments made by GIM IARs. GIM has no obligation to recommend for purchase or sale a security that GIM, its officers or employees may purchase, sell, or hold.

It is the express policy of GIM that no person employed by GIM may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such an employee from benefiting from transactions placed on behalf of advisory accounts. GIM requires that all officers and employees must act in accordance with all applicable federal and state regulations governing the registered investment advisory practices. Any individual not in observance of these rules is subject to termination.

In situations where GIM or any related person has an interest or position in a certain securities which may be recommended to Clients, GIM has adopted the following restrictions in order to ensure its fiduciary responsibilities:

- A director, officer, or an employee of GIM shall not buy or sell securities for their own portfolios where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless such information is also available to the investing public on reasonable inquiry, No associated person of GIM shall prefer his or her own interest to that of an advisory Client.
- GIM maintains a list of all securities holdings for itself, and anyone associated with its advisory practice. These holdings are reviewed on a regular basis by Ram Kolluri, President and Chief Compliance Officer of GIM.

GIM has procedures dealing with insider trading, employee related accounts, “front running” and other issues that may present a potential conflict when such purchase, sales or recommendations are made. In general, these policies and procedures are intended to eliminate, to the extent possible, the adverse effect on Clients of any such potential conflicts of interest. If potential insider information is inadvertently provided or learned by a principal or employee, it is the policy of GIM strictly to prohibit its use.

**At no time, will GIM or any associated person of GIM, transact in any security to the detriment of any Client.**

## **Item 12 - Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

GIM may recommend that its Clients hold their accounts with either Charles Schwab & Co. (“Schwab”) or TD Ameritrade Institutional – a division of TD Ameritrade Inc., member FINRA/SIPC/NFA (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. Both the firms are discount brokers offering competitive services and pricing. GIM has been able to negotiate the commissions charged to its Clients with Schwab and TD Ameritrade, at a rate that is highly competitive for the services provided. All the commission savings are directly passed on to GIM's Clients in the form of lower costs. However, it may be possible that Clients may be able to purchase investments elsewhere at a lower rate. Both Schwab and TD Ameritrade offer independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program.

As a part of the brokerage relationship, GIM receives a daily electronic download of its customer accounts information, transactions, and prices from both Schwab and TD Ameritrade, free of charge. GIM considers this information necessary and customary to the conduct of its business, and to comply with the record keeping requirements of the Investment Advisers Act of 1940. Separately, adviser receives some benefits from TD Ameritrade through its participation in the institutional brokerage program (see disclosure under Item 14 below)



As disclosed above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Advisor also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Advent. TD Ameritrade provides the Additional Services to Advisor in its sole discretion and at its own expense, and Advisor does not pay any fees to TD Ameritrade for the Additional Services. Advisor and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services. Advisor's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Advisor, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Advisor's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Advisor, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Advisor may have an incentive to recommend to its Clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Advisor's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including seeking of best execution of trades for Client accounts.

## **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. GIM will execute its transactions through an unaffiliated broker-dealer selected by GIM or the Client. We 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

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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**

Ram Kolluri is President and Chief Investment Officer. He is responsible for developing investment research and strategies to manage Client portfolios. Ram is assisted by a team of professionals (members of the investment committee) that are responsible for the implementation and monitoring of Client portfolios. All Client investments are based upon written investment policy statement developed in consultation with the Client. The policy takes careful consideration of the Client's investment objectives, risk tolerance, liquidity and income needs, and investment time horizon. The portfolios are reviewed semi - annually with the Client. Client accounts are monitored on an ongoing basis for adherence to investment strategy and Client objectives.

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

Each Client account will be reviewed at least semi-annually to ensure that the strategy continues to fit their individual circumstances and objectives. Reviews may be conducted more 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. Our Clients are encouraged to notify us if changes occur in their financial situation that might impact their investment strategy.

Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

All Client assets are held at a brokerage firm which is a member of the New York Stock Exchange. The brokerage firm is responsible for execution and direct reporting of all transactions (via trade confirms and monthly statements) in the Client's account as per the regulations of the exchange. GIM is granted a limited authorization by the Client to trade in the account and to receive copies of trade confirms. GIM provides a written report at the completion of each calendar quarter which details the Client's portfolio valuation, investment gains and losses, and time weighted return (TWR) performance of the account.

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

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### **A. Compensation Received by GIM**

GIM is a Fee-Only advisor, who, in all circumstances, is **compensated solely by the Client**.

As disclosed under item 12 above, adviser participates in the TD Ameritrade's institutional customer program and adviser may recommend TD Ameritrade to clients for custody and brokerage services. Although there is no direct link between adviser's participation in the program and the investment advice it gives to its clients, the adviser receives certain economic benefits through its participation in the program that may or may not be available to other independent investment advisers that are participating in the program. Specifically, the adviser receives financial assistance in maintaining a portfolio accounting software license and its related data warehousing costs (Advent AXYS software) on an annual basis. These costs are directly paid by TD Ameritrade to Advent Software, Inc.



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

At this time, GIM does not directly or indirectly compensate anyone for Client referrals.

### **Item 15 - Custody**

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GIM 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 GIM to utilize that custodian for the Client's security transactions. For more information custodians and brokerage practices, see Item 12 - Brokerage Practices.

While GIM does not have custody of Client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds Client assets. In certain jurisdictions this may be deemed constructive custody. Prior to permitting direct debit of fees each Client provides written authorization permitting fees be made direct from the custodian. GIM will send the Client and the custodian a bill showing the amount of the fee and the way in which it was calculated. The custodian sends every Client an account statement not less than quarterly showing all account activity, including the amounts disbursed from the account to GIM.

### **Item 16 - Investment Discretion**

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Clients grant GIM a limited power of attorney to select, purchase or sell securities without obtaining the specific consent of the Client within the Client's account(s) under the management of GIM. There are no restrictions upon the securities that may be purchased, sold or held in the Client's account unless these restrictions are provided to GIM in writing or specified within the Investment Advisory Agreement between the Client and GIM. However, GIM will carefully observe the limitations on its investment activities (such as types of investments) and Client risk tolerances, which are expressly, contained in the Client's investment policy statements.

### **Item 17 - Voting Client Securities**

Unless otherwise stipulated by contract, GIM will vote proxies on behalf of Clients. GIM has established policies and procedures to ensure that proxies are voted in an appropriate manner. In voting proxies, GIM's primary purpose and fiduciary responsibility is to seek to enhance the value of the security, or to reduce potential for a decline in the security's value. GIM will vote proxies in the best interests of its Clients. Each proxy issue will be considered individually. GIM has established voting guidelines, but will not be used as rigid rules.

In exercising its voting discretion, GIM shall avoid any direct or indirect conflict of interest raised by such voting decision. In cases where there is potential conflict of interest, GIM will seek the advice of counsel or a third party before voting, such as Risk Metrics Group.

GIM may abstain from voting or decline a vote in those cases where there appears to be no relationship between the issue and the enhancement or preservation of an investment's value. GIM intends to process every proxy it receives for all domestic and foreign securities; however, there may be situations in which GIM may be unable to vote a proxy, or may chose not to vote a proxy, such as where: (i) proxy ballot was not received from the custodian, (ii) a meeting notice was received too late; (iii) there are fees imposed upon the exercise of a vote and it is determined that such fees outweigh the benefit of voting; (iv) there are legal encumbrances to voting; (v) shares were held shares on the record date but were sold prior to the meeting date; or (vi) other reasons not stated herein where GIM believes it is not in the best interest of the Partnership to vote the proxy.

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## **Item 18 - Financial Information**

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Neither GIM, nor its management has any adverse financial situations that would reasonably impair our ability to meet all obligations to its Clients. Neither GIM, nor any of its advisory persons, have been subject to a bankruptcy or financial compromise. We are not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees for services to be performed six months or more in advance. Please see Item 5- Fees and Compensation for additional information.

## **Privacy Policy**

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**Effective: January 20, 2011**

GIM is committed to safeguarding the use of your personal information that we have as your Investment Advisor. GIM (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 GIM 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 you're:

- |   |                                  |
|---|----------------------------------|
| • 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 GIM Shares**

GIM 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

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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 GIM'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**

GIM 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 (609) 452-292.

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## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Ram Kolluri**  
**President/Chief Investment Officer/Chief Compliance Officer**

**Effective: March 12, 2011**

This Brochure Supplement provides information about the background and qualifications of Ram Kolluri (CRD# 707814) in addition to the information contained in the Global Investment Management LLC (“GIM”) Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the GIM Brochure or this Brochure Supplement, please contact us at (609) 452-2929.

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

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## Item 2 – Educational Background and Business Experience

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### RAM KOLLURI

**Born:** 1949 - India

**Education:**

Andhra University (India)  
1964 through 1967  
BSc in Mathematics

Chartered Accountant  
Institute of Chartered Accountants (India) - 1972

Pace University, New York, NY  
1977 through 1979  
Masters Business Administration (Finance)

Certified Financial Planner (CFP) - 1983

**Business Background:**

President, Chief Investment Officer, CCO Global Investment Management LLC	2010 to Present
Director, Chief Investment Officer ICICI Group-Global Private Clients	2008 to 2010
President, Chief Investment Officer Global Investment Management, Inc.	1996 to 2008
Co - founder, Individual Asset Planning Corporation, Princeton, NJ Chief Investment Officer	1983 to 1996

## Item 3 – Disciplinary Information

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GIM 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 anyone providing services to you.

**There are no legal or disciplinary events to disclose regarding Ram Kolluri.**

However, we do encourage you to independently view the background of Ram Kolluri on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Select the option for Investment Adviser Representative and enter **707814** in the field labeled "Individual CRD Number:"

## Item 4 – Other Business Activities

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Mr. Kolluri is not involved in any other business activities outside of GIM.

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## **Item 5 - Additional Compensation**

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Mr. Kolluri does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of GIM.

## **Item 6 - Supervision**

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Mr. Kolluri serves as President, Chief Investment Officer and Chief Compliance Officer of GIM. Mr. Kolluri's contact information is included on the cover of this Brochure Supplement. Ram Kolluri is the Chair of the GIM Investment Committee and has general oversight of all investment decisions at GIM.

GIM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of GIM. Further, GIM is subject to regulatory oversight by various agencies. These agencies require registration by GIM and its employees. As a registered entity, GIM is subject to examinations by regulators, which may announced or unannounced. GIM is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Lino DeAngelis  
Vice President & Wealth Manager**

**Effective: February 10, 2012**

This Brochure Supplement provides information about the background and qualifications of Lino DeAngelis (CRD# 5085579) in addition to the information contained in the Global Investment Management LLC (“GIM”) Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the GIM Brochure or this Brochure Supplement, please contact us at (609) 452-2929.

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

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## Item 2 – Educational Background and Business Experience

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### LINO DeANGELIS

**Born:** 1975

**Education:**

Bentley University  
2008 through 2011  
MS in Financial Planning

Villanova University  
1994 through 1998  
BS in Finance

Certified Financial Planner (CFP)

**Business Background:**

Vice President & Wealth Manager Global Investment Management LLC	2007 to Present
Wealth Manager Janney Montgomery Scott	2005 to 2006
Wealth Manager Radnor Financial Advisors	1998 to 2005

## Item 3 – Disciplinary Information

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GIM 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 anyone providing services to you.

**There are no legal or disciplinary events to disclose regarding Lino DeAngelis.**

However, we do encourage you to independently view the background of Lino DeAngelis on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Select the option for Investment Adviser Representative and enter 5085579 in the field labeled "Individual CRD Number."

## Item 4 – Other Business Activities

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Lino DeAngelis is not involved in any other business activities outside of GIM.

## Item 5 – Additional Compensation

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Lino DeAngelis does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of GIM.

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## **Item 6 - Supervision**

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Lino DeAngelis is supervised by Mr. Ram Kolluri, President, Chief Investment Officer and Chief Compliance Officer of GIM. Mr. Kolluri's contact information is included on the cover of this Brochure Supplement. Lino DeAngelis serves as a member on the GIM Investment Committee and is partly responsible for implementation of the committee's ongoing investment decisions.

GIM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of GIM. Further, GIM is subject to regulatory oversight by various agencies. These agencies require registration by GIM and its employees. As a registered entity, GIM is subject to examinations by regulators, which may announced or unannounced. GIM is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.



GLOBAL INVESTMENT MANAGEMENT

## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Ms. Keka Rath  
Vice President & Wealth Manager**

**Effective: March 12, 2011**

This Brochure Supplement provides information about the background and qualifications of Keka Rath (CRD# 5091421) in addition to the information contained in the Global Investment Management LLC (“GIM”) Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the GIM Brochure or this Brochure Supplement, please contact us at (609) 452-2929.

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

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## Item 2 – Educational Background and Business Experience

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### KEKA RATH

**Born:** 1969

**Education:**

Delhi University  
1987 through 1990  
BS in Mathematics

University of Bradford (UK)  
Post Graduate Certification in Business

Certified Financial Planner (CFP)

**Business Background:**

Vice President & Wealth Manager Global Investment Management LLC	2005 to Present
Student Middlesex County College	2000 to 2005

## Item 3 – Disciplinary Information

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GIM 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 anyone providing services to you.

**There are no legal or disciplinary events to disclose regarding Keka Rath.**

However, we do encourage you to independently view the background of Keka Rath on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Select the option for Investment Adviser Representative and enter 5091421 in the field labeled “Individual CRD Number:”

## Item 4 – Other Business Activities

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Keka Rath is not involved in any other business activities outside of GIM.

## Item 5 – Additional Compensation

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Keka Rath does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of GIM.

## Item 6 – Supervision

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Keka Rath is supervised by Mr. Ram Kolluri, President, Chief Investment Officer and Chief Compliance Officer of GIM. Mr. Kolluri's contact information is included on the cover of this Brochure Supplement. Keka Rath serves as a member on the GIM Investment Committee and is partly responsible for implementation of the committee's ongoing investment decisions.

GIM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of GIM. Further, GIM is subject to regulatory oversight by various agencies. These agencies require registration by GIM and its employees. As a registered entity, GIM is subject to examinations by regulators, which may announced or unannounced. GIM is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.



## **Form ADV Part 2B – Individual Disclosure Brochure**

**for**

**Timothy Kingston  
Wealth Manager**

**Effective: December 6, 2011**

This Brochure Supplement provides information about the background and qualifications of Tim Kingston (CRD# 4606266) in addition to the information contained in the Global Investment Management LLC ("GIM") Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the GIM Brochure or this Brochure Supplement, please contact us at (609) 452-2929.

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

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## Item 2 – Educational Background and Business Experience

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**Timothy Kingston**

**Born:** 1977

**Education:**

Rutgers University  
Graduated in 2000  
BA in Psychology

Certified Financial Planner (CFP)

**Business Background:**

Wealth Manager	October 2011 to Present
Global Investment Management LLC	
Financial Planning Associate	July 2008 to September 2011
ICICI Securities Holding Inc / Global Investment Management, LLC	January 2003 to August 2006
Equity Trader	July 2000 to December 2002
Assent / Hold Brothers – NASD Broker / Dealers	
Claims Representative	
Atlantic Mutual Insurance Companies	

## Item 3 – Disciplinary Information

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GIM 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 anyone providing services to you.

**There are no legal or disciplinary events to disclose regarding Tim Kingston**

However, we do encourage you to independently view the background of **Tim Kingston** on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Select the option for Investment Adviser Representative and enter 4606266 in the field labeled “Individual CRD Number:”

## Item 4 – Other Business Activities

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Tim Kingston is not involved in any other business activities outside of GIM.

## Item 5 – Additional Compensation

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Tim Kingston does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of GIM.

## **Item 6 - Supervision**

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Tim Kingston is supervised by Mr. Ram Kolluri, President, Chief Investment Officer and Chief Compliance Officer of GIM. Mr. Kolluri's contact information is included on the cover of this Brochure Supplement. Tim serves as a member on the GIM Investment Committee and is partly responsible for implementation of the committee's ongoing investment decisions.

GIM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of GIM. Further, GIM is subject to regulatory oversight by various agencies. These agencies require registration by GIM and its employees. As a registered entity, GIM is subject to examinations by regulators, which may announced or unannounced. GIM is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.