

Global Guru Capital LLC

Client Brochure

This brochure provides information about the qualifications and business practices of Global Guru Capital LLC. If you have any questions about the contents of this brochure, please contact us at (800) 910-6491 or by email at: nvardy@globalgurucap.com. 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.

Additional information about Global Guru Capital LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Global Guru Capital LLC's CRD number is: 147220

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

Global Guru Capital LLC has no material changes to report since the previous annual amendment filed on March 20, 2012.

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of the Advisory Firm

This firm has been in business since June 18, 2008, and the principal owner is Nicholas A. Vardy.

B. Types of Advisory Services

Global Guru Capital LLC (hereinafter "GGC") offers the following services to advisory clients:

Investment Supervisory Services

GGC offer accredited investors (with a net worth of \$1.5 million or investable assets of \$750,000) a "success fee only" investment management service.

GGC offers three investment programs: (1) The "Ivy Plus" Investment Program (2) the "Global Gains" Investment Program, and (3) the "Double Your Dividends" Program. GGC will make best efforts to invest the assets of all individual participants uniformly across each program, although it cannot guarantee completely identical allocations. The details of each investment program are set out in the relevant Investment Policy Statement.

Nicholas Vardy, Chief Investment Officer of GGC, makes regular investment recommendations through three newsletters (Bull Market Alert, The Alpha Investor Letter, and Triple Digit Trader) published by Eagle Publishing. Representatives of GGC will not invest personally (or on behalf of clients) until subscribers receive the newsletters (24 hours after they go out via email), in accordance with the trading policies of Eagle Publishing.

Services Limited to Specific Types of Investments

GGC limits its money management to mutual funds, equities, bonds, fixed income, ETFs, hedge funds, REITs, and government securities. GGC may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

GGC offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

GGC does not participate in any wrap fee programs.

E. Amounts Under Management

GGC has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$4,394,412.29	\$0.00	12/31/2012

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

“Ivy Plus” Program

Either 1.5% annual management fee based of assets under management, payable in arrears on a quarterly basis OR a performance fee of 10% of net profits charged quarterly. Appreciation is determined by taking into account income earned on the managed assets after all fees have been incurred, and includes all realized and unrealized capital gains and losses for the period. The performance fee is assessed on a quarterly basis. If the account shows no profits, no performance is charged.

“Global Gains” Investment Program

A performance fee of 10% of net profits charged quarterly. Appreciation is determined by taking into account income earned on the managed assets after all fees have been incurred, and includes all realized and unrealized capital gains and losses for the period. The performance fee is assessed on a quarterly basis. If the account shows no profits, no performance is charged.

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with thirty days’ written notice. Clients will be charged on the basis of all realized and unrealized capital gains and losses for the period. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client’s accounts with client’s advanced written authorization.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client’s accounts with client written authorization. Fees are paid quarterly in arrears.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by GGC. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

GGC collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither GGC nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

GGC manages accounts that are billed on performance based fees (a share of capital gains on or capital appreciation of the assets of a client) as well as accounts that are NOT billed on performance based fees. Managing both kinds of accounts at the same time presents a conflict of interest because GGC or its supervised person's have an incentive to favor accounts for which GGC and its supervised persons receive a performance-based fee. GGC addresses the conflicts by ensuring that clients who have performance based accounts do not receive preferential treatment. GGC provides best execution practices and upholds its fiduciary duty for all clients.

Clients that are paying a performance based fee should be aware that investment advisors have an incentive to invest in riskier investments when paid a performance based fee due to the higher risk/higher reward attributes.

Item 7: Types of Clients

GGC generally provides management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

Minimum Account Size

There is an account minimum, \$250,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

GGC's methods of analysis include fundamental analysis, technical analysis, and cyclical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

GGC uses long term trading, short term trading and margin transactions strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold : 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading and margin transactions generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

GGC generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize margin transactions which generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither GGC nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither GGC nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Nicholas A. Vardy is the editor of four financial newsletters: The Global Guru, Bull Market Alert, The Alpha Investor Letter, and Triple Digit Trader. From time to time, he will offer clients advice or products from those activities. GGC always acts in the best interest of the client.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

GGC does not utilize nor select other advisors or third party managers. All assets are managed by GGC management.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Record keeping, Annual Review, and Sanctions. Clients may request a copy of our Code of Ethics from management.

B. Recommendations Involving Material Financial Interests

GGC does not recommend that clients buy or sell any security in which a related person to GGC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of GGC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of GGC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. GGC will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of GGC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of GGC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. GGC will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

1. Research and Other Soft-Dollar Benefits

GGC receives no research, product, or service other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

GGC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

GGC will not allow clients to direct GGC to use a specific broker-dealer to execute transactions. Clients must use GGC recommended custodian (broker-dealer). By requiring clients to use our specific custodian, GGC may be unable to achieve most favorable execution of client transactions and this may cost clients money over using a lower-cost custodian.

B. Aggregating (Block) Trading for Multiple Client Accounts

GGC maintains the ability to block trade purchases across accounts. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least monthly only by Nicholas A. Vardy, Owner. Nicholas A. Vardy is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at GGC are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly a written report that details the client's account which may come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

GGC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to GGC clients.

B. Compensation to Non –Advisory Personnel for Client Referrals

GGC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

GGC does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the Custodian.

Item 16: Investment Discretion

For those clients' accounts where GGC provides ongoing supervision, the client has given GGC written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides GGC discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

GGC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

GGC does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither GGC nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

GGC has not been the subject of a bankruptcy petition in the last ten years.