

GLOBAL VIEW CAPITAL



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Disclosure Brochure

March 18, 2013

This brochure provides information about the qualifications and business practices of Global View Capital Management, LTD. If you have any questions about the contents of this brochure, please contact us at 262.650.1030. 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.

Global View Capital Management, LTD 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 provides you with information about an adviser which will help you determine to hire or retain an adviser. Additional information about Global View Capital Management, LTD also is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Global View Capital Management, LTD (“GVCM, we, us, our, ours”) has made the following Material Changes to its Brochure since it initially published on November 11, 2011:

- 1. GVCM sponsors the Personalized Managed Account Program. Additional information is available in the *GVCM Personalized Account Program Brochure*, available upon request.
- 2. GVCM offers Advice Direct, an asset allocation service available to 401(k) and other retirement program participants.

We will see that you receive a summary of any material changes to our brochures by April 29th of each year. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date of our last

annual update of our brochure.

Currently, our brochure may be requested by contacting Dina L. Fliss, President, at 262.650.1030 or dina@gvcaponline.com. We will provide you with a new brochure at any time without charge.

Additional information about our company is also available via the SEC’s website: www.adviserinfo.sec.gov.

The SEC’s website also provides information about any persons affiliated with us who are registered as investment adviser representatives of GVCM. Information on our investment adviser representatives who work with your account can be found in our brochure supplements.

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Advisory Business

GVCN is a corporation organized under Wisconsin state law. Dina Fliss founded the Waukesha-based investment advisory firm in 2011. The firm is a wholly owned subsidiary of Global View Capital Holdings, Ltd, which is owned by Dina Fliss and Dean Fliss. GVCN is a SEC registered investment advisory firm.

As of December 31, 2012, GVCN managed \$217.3 million in client assets on a discretionary basis.

Sub-Adviser to Flexible Plan Investments, Ltd. ("FPI")

We provide investment advisory services as a sub-adviser to Flexible Plan Investments, Ltd. ("FPI"). FPI is a federally registered investment adviser which sponsors the Strategic Solutions Program (the "Program"). Model portfolios are designed to meet various investment objectives. These model portfolios are actively managed and are offered through the Program.

We manage the models to specific objectives rather than to the individual needs of clients. The investment advisers that utilize our services match the suitability of our strategies to their client's personal financial situation through the use of a suitability questionnaire. Restrictions on investing may preclude an adviser from choosing our models for their clients' portfolios.

Our consulting services are offered as

part of a wrap fee program. The fee you pay to us is included in the wrap fee you pay to FPI. We do not manage accounts on a non-wrapped basis.

Personalized Managed Account Program

GVCN sponsors the Personalized Managed Account Program (the "Program"), which includes selection of third party asset managers, asset allocation strategies and proprietary models, performance reporting, and discretionary asset management.

You will work with your Financial Advisor to select suitable allocations and models, and to monitor your accounts. More complete information about the Program may be found in the *GVCN Personalized Managed Account Program Brochure* ("Program Brochure") which is available upon request.

Advice Direct

GVCN provides asset allocation models to individual participants of company-sponsored 401(k) retirement plans, simple IRA, 403b, and 457 defined contribution retirement plans through the Advice Direct, a service offered by GVCN. Advice Direct is offered via a secure web-based portal administered by GVCN and is provided to individual plan participants rather than to the plan sponsor or employer.

Your financial advisor will collect information from you regarding your investment objectives, time horizon, risk tolerance and other pertinent

information for your plan account. Your financial advisor will also collect information about your plan, including current contribution levels, plan holdings, investments selections and allocation. Advice Direct will use this information to recommend asset allocation models based on the Client's expressed needs and objectives. Quarterly, Advice Direct will provide recommendations for changes to the allocations. More frequent recommendations may be provided based on changes in market conditions and your financial information. We encourage you to contact your Financial Advisor about any changes to your Advice Direct profile so we may continue to provide appropriate recommendations. **Please Note:** You are under no obligation to accept any recommendations. At all times, you shall remain responsible to determine whether or not to accept the recommendations, and if you do, to implement the recommendations. GVCN does **not** provide implementation services.

GVCN has engaged 401(K) GPS, Inc., an unaffiliated SEC-registered investment adviser, to provide advice and recommendations regarding the accounts of clients who subscribe to Advice Direct.

Fees and Compensation

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians ("custodian/

broker-dealer"). Your custodian/broker-dealer determines the values of the assets in your portfolio.

FPI Program Fees

We offer our services on a fee-only basis. You must authorize FPI in writing to have the custodian/broker-dealer pay FPI and indirectly us by charging your account. One-fourth of the annual fee is charged each calendar quarter. Your custodian/ broker-dealer provides you with statements that show the amount paid for advisory services. You should review and verify the calculation of our fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations.

Fees for the initial quarter are prorated based upon the number of calendar days in the calendar quarter that our agreement is in effect. Thereafter, our fee is calculated based upon the market value of the assets in your account at the end of each calendar quarter.

Our fee schedules are as follows:

GPS Fee Schedule	
<u>Assets under Management</u>	<u>Advisory Fee</u>
Up to \$500,000	1.00%
\$500,000 - \$999,999	0.75%
\$1,000,000 and above	0.50%

Advisory fees are shared by GVCN and FPI. All fees are negotiable at our sole discretion. Up to 20 basis points may be

credited back to your account depending upon the use of the Direxion Evolution mutual funds that are sub-advised by FPI for the portfolios. Accounts under \$25,000 will be charged a small account fee. Advisory fee does not include solicitor's fee. Please see FPI's Part 2A, Appendix 1, Wrap Fee Program Brochure for more details about fees and expenses.

THAS, TEMS, GMET & GMIT Fee Schedule	
<u>Assets under Management</u>	<u>Advisory Fee</u>
Up to \$500,000	1.00%
\$500,000 - \$999,999	0.75%
\$1,000,000 and above	0.50%

Advisory fees are shared by GVCM and FPI. All fees are negotiable at our sole discretion. Accounts under \$25,000 will be charged a small account fee. Advisory fee does not include solicitor's fee. Please see FPI's Part 2A, Appendix 1, Wrap Fee Program Brochure for more details about fees and expenses.

In addition to the wrap fee, you will be required to pay other charges (as applicable) such as:

- custodial fees,
- SEC fees,
- internal fees and expenses charged by mutual funds, ETFs, or variable annuity subaccounts, and
- taxes on brokerage accounts and securities transactions.

You will be provided with a copy of FPI's ADV Part 2A, Appendix 1, Wrap

Fee Program Brochure which discloses additional aspects of the wrap programs.

Personalized Asset Management Program Fees

Fees are fully described in the *Program Brochure*. The maximum annual fee is 2.4%. Fees are payable quarterly in advance. The wrap fee you pay for this program includes advisory, management, transaction and custodial fees. In addition to our wrap fee, you may be required to pay other charges such as internal fees and expenses charged by mutual funds, ETFs, and variable annuities; IRA fees; special custodial services; and taxes on brokerage accounts and transactions.

Advice Direct Fees

GVCM charges a fixed subscription fee for the Advice Direct services. The cost is \$395 annually. The fee is payable quarterly in advance, in installments of \$98.75 each quarter. You may terminate your subscription at any time and will not be billed for future quarters. However, you will not receive a refund of any prepaid fees.

In addition to the subscription fee, you may be required to pay other fees and expenses (as applicable) such as:

- custodial or plan fees, and
- brokerage or transaction fees.

These fees are part of your plan expenses and are not related to our service. We do not receive any portion of these fees. Please be sure to read the section entitled

“Brokerage Practices,” which follows later in this brochure.

In addition to plan fees, mutual fund companies and exchange traded funds (“ETFs”) charge internal fees and expenses for their products. Complete details of these internal fees and expenses are explained in the prospectuses for each fund. You are strongly encouraged to read these explanations before investing any money. Our subscription fee is not reduced by the amount of any fund or plan fees.

GVCN remits a portion of its fee to 401(K)GPS, Inc. for its services as subadvisor. Additionally, a portion of the fee is paid to your Financial Advisor. Your fee for Advice Direct is not increased as a result of these arrangements.

The fee for this service does not include any other professional services that may be required to implement the recommendations we make.

General Information About Our Fees

Mutual fund companies, ETFs, variable life insurance, and variable annuities charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us. Complete details of these internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money. You may ask us any questions you have about fees and expenses.

Mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company. While you may purchase shares of mutual funds directly from the mutual fund company without an advisory fee, those investments would not be part of our advisory relationship with you. This means that they would not be included in our investment strategies, investment performance monitoring, or portfolio reallocations.

Please be sure to read the section entitled “Brokerage Practices,” which follows later in this brochure.

You pay our advisory fees after receiving our services. You may terminate your advisory agreement within five (5) business days from the date the agreement is executed, without penalty.

Should any party to the agreement terminate the agreement before the end of a billing period, any fees that we have earned are immediately due and payable. Except for the Advice Direct Program, any unearned fees will be refunded on a pro rata basis.

Our President, Dina Fliss, and James F. Wawrzyniakowski, Jr., Chief Compliance Officer, are also registered representatives of the Strategic Financial Alliance, Inc. (the “SFA”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. They are also licensed with various insurance companies. They may earn commissions if investment or insurance products are

purchased through them in these capacities.

Our programs, including those through FPI, may be offered through advisory representatives of the SFA who are also associated with our affiliate, Global View Capital View Advisors. When you purchase our services through these advisory representatives, they and the SFA will receive a portion of the advisory fee you pay to us.

In Mr. Wawryniakowski's role with the SFA, he is the designated supervisor of those representatives of the SFA who are also associated with Global View Capital Advisors.

This presents a conflict of interest because it creates an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investment with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the

profits made on the investments. We do not charge performance-based fees on any of our client accounts.

Types of Clients

We provide sub-advisory services to other investment advisers. The minimum account size for starting and maintaining an advisory relationship through FPI is \$5,000.

The minimum account size for the Personalized Asset Management Program is \$ 25,000. We, at our sole discretion, may accept clients with smaller portfolios or lower minimums based upon certain factors including:

- anticipated future earning capacity,
- anticipated future additional assets,
- account composition,
- related accounts, and
- pre-existing client relationships.

We may consider the portfolios of your family members to determine if your portfolio meets the minimum size requirement. Certain third party asset managers may have higher minimum account requirements which will be described in the account opening documentation.

There is no minimum account size for the Advice Direct service.

Methods of Analysis, Investment Strategies and Risk of Loss

GVCN uses technical analysis in the selection of specific investments for your portfolios.

Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volumes. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.

We manage the following strategies as sub-advisors to Flexible Plan Investments, Ltd:

Globalview Portfolio Strategies

Globalview Portfolio Strategies (“GPS”) offers seven model portfolios, each of which is a blend of at least five actively managed strategies. The blended strategies in each of the model portfolios are chosen from over 70 different strategy profiles maintained, traded and monitored by FPI. Each of the strategy profiles are actively managed and follow a rules-based discipline. Each portfolio is comprised of no-load mutual funds, ETFs, variable annuity or variable life insurance subaccounts. Available model portfolios are designed to meet the following investment objectives:

- Aggressive,
- Growth,

- Balanced,
- Moderate,
- Conservative,
- Enhanced Income (assumes a 5% annual withdrawal), and
- Bond Opportunities.

Tactical Hard Asset Strategy

Security selection for the Tactical Hard Asset Strategy (“THAS”) begins with a universe of exchange traded funds (“ETFs”) and no-load or load-waived mutual funds that cover primarily commodity producers and physical commodities, national currencies from resource-rich nations or those that may rise against the falling US Dollar. Certain mutual funds may be used occasionally. GVCN subscribes to AdvisorGuide, a research service providing daily rankings of mutual funds and ETFs using a proprietary algorithm program, and Index Universe, an independent subscription service that provides news, research and analytical tools related to index funds, ETFs and index derivatives. GVCN then employs momentum-based, relative strength and trend following analysis to further identify the specific securities selected and the weighting used to gain exposure to market leaders. To provide downside protection in a bear market, stop-loss limits allow for the assets to shift to money market or bond investments.

Tactical Emerging Markets Strategy

Security selection for the Tactical Emerging Markets Strategy (“TEMS”) begins with a universe of ETFs and no-load or load-waived mutual funds that cover primarily the emerging and frontier markets equity funds. GVCN subscribes to AdvisorGuide, a research service providing daily rankings of mutual funds and ETFs using a proprietary algorithm program, and Index Universe, an independent subscription service that provides news, research and analytical tools related to index funds, ETFs and index derivatives.

GVCN then employs momentum-based, relative strength and trend following analysis to further identify the specific securities selected and the weighting used to gain exposure to market leaders. To provide downside protection in a bear market, stop-loss limits allow for the assets to shift to money market or bond investments.

Global Macro Equity – Tactical Strategy

The Global Macro Equity – Tactical Strategy (“GMET”) applies an approach similar to that used by global macro managers in the institutional world who seek a way to protect against downside risk. Known as the “ultimate go-anywhere” strategy, the unrestrictive nature of the global macro allows managers to seek and take advantage of price movements in any market around the world across a diverse range of strategies that includes equities (US,

Developed International and Emerging Markets) and commodities (Precious Metals, Basic Materials and Agriculture). Bonds (US and International), money market, currency and inverse funds may be used to provide defensive positions during high-risk events.

The Global Macro Equity – Tactical portfolio seeks equity-like returns with potentially lower volatility in pursuit of better risk-adjusted returns. Global macro is a top-down approach to investing that utilizes a combination of fundamental/ macroeconomic data as well as quantitative technical disciplines, allowing global macro managers to tactically allocate capital across a wide range of global financial markets. No-load, no-transaction fee mutual funds are exclusively utilized to provide liquidity.

The sub-advisor, Global View Capital Management, LTD, has developed a proprietary set of targeted risk metrics for the portfolio that are similar to a balanced fund that can be blended with other lower – to higher – volatility strategies in seeking to deliver a customized portfolio based upon the investor’s risk tolerance and time horizon.

Global Macro Income – Tactical Strategy

The Global Macro Income – Tactical strategy utilizes a multiple strategy approach across a broad range of global income-orientated asset classes such as US bonds (Government, Municipal, Investment-Grade, High-Yield, Floating Rate, money market and Mortgage-

Backed), global bonds (USD Hedged & Un-hedged, and convertible securities. It seeks to protect against the downside risk and therefore achieve a higher yield than traditional “buy & hold” bond strategies.

The global macro approach of multiple strategies in multiple global markets allows the sub-advisor, Global View Capital Management, Ltd., to employ a top-down approach to investing that utilizes a combination of fundamental/macroeconomic data as well as technical disciplines. The unrestrictive nature of global macro allows the manager to take advantage of global asset classes in a low-yielding world, and the proprietary rule-set allows for tactical movements into money market, convertible securities and inverse funds (hedging) in seeking to protect the portfolio during high-risk events and/or rising interest rate environments.

Additionally, for the Personalized Asset Management Program (“Program”), we have engaged Argentus Capital Management, LLC, an unaffiliated registered investment adviser, to provide GVCN with model portfolios and to assist us in selecting funds and managers for our Program platform and strategies.

Our investment strategies may include long-term and short-term purchases. Frequent trading can affect investment performance through increased taxes. You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

All investments involve risk. The primary risk for all investments is a risk of loss of principal or that the proceeds received from the sale of an investment will be less than the original funds used to purchase the same investment. The risk of loss of principal can be severe at times depending on the market environment and market events. Although we attempt to design our portfolios to limit portfolio risk and volatility, you should be prepared to assume a risk of loss of principal with any investment that you make. Other risks that you may experience and that may cause a risk of loss of principal include but are not limited to:

- Inflation Risk: The risk of loss of purchasing power resulting from rising prices over time.
- Interest Rate Risk: For fixed income securities, the risk that interest rates will rise which will result in declining security prices.
- Default Risk: The risk that an issuer/borrower will not make its interest or principal payments as they come due.
- Currency Risk: The risk that securities denominated in other currencies lose value as the value of the underlying currency declines.
- Political Risk: Risk that government intervention, restrictions, or expropriation may result in a loss of principal.
- Business Risk: Risk that a business will be unable to continue ongoing operations as a result of increased

competition, mismanagement, or financial insolvency.

Additionally, 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 may not always follow patterns.

Although we manage your portfolio in a manner consistent with your risk tolerances, we cannot guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

Advice Direct

For the recommendations made to participants in our Advice Direct service, we rely on the analysis and advice of 401(K) GPS, Inc, an unaffiliated third party subadviser to provide recommendations regarding changes to client accounts.

When determining whether to engage a third party investment adviser as subadviser, we generally examine the experience and expertise of the adviser and monitor the recommendations made by the adviser on a periodic basis. Additionally, as part of our due-diligence process, we survey the adviser's operational and business enterprise risks and controls.

A risk of utilizing a third-party subadviser that has been successful in the past is that the adviser may not be able to

replicate that success in the future. In addition, as we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Disciplinary Information

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

Other Financial Industry Activities and Affiliations

As explained under "Fees and Conditions" above, our President is licensed as a registered representative through The Strategic Financial Alliance, Inc. (the "SFA"). She is also licensed as an insurance agent with various insurance carriers.

Global View Capital Insurance, Ltd, an insurance agency, is a wholly owned subsidiary of Global View Capital Holdings, Ltd., which in turn is owned by Dina Fliss and Dean Fliss. When you purchase insurance products through this agency, Ms. Fliss and Mr. Fliss will receive compensation. Ms. Fliss also serves as the firm's President.

Dean Fliss, an indirect owner of GVCM, also is a registered representative and advisory representative of the SFA. Mr.

Fliss may receive a portion of the fees earned by certain advisory representatives of the SFA as a form of override for providing certain administrative services to the advisory representatives.

James F. Wawrzyniakowski, Jr., Chief Compliance Officer, is also a registered principal of the SFA, and in that capacity supervises certain advisory representatives of the SFA.

This presents a conflict of interest because it creates an incentive to make recommendations based upon the amount of compensation we can receive rather than based upon your investment needs. As previously noted, we will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. You have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

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

We have adopted a Code of Ethics (“Code”) to address the securities-related conduct of our financial advisors and employees. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our employees be conducted in a manner consistent with the Code and avoid any actual or potential conflict of interest, or any abuse of an employee’s position of trust and responsibility;
- that employees may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the Code to you or any prospective client upon request.

We do not buy or sell securities for our firm that we also recommend to clients. Our employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by employees may raise potential conflicts of interest when they trade in a security that is:

- owned by you or
- considered for purchase or sale for you.

We have adopted policies and procedures that are intended to address

these conflicts of interest. These policies and procedures:

- require our employees to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in an employee receiving a better price than a client.

Employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Brokerage Practices

FPI uses the Trust Company of America (“TCA”) for the account broker-dealer/custodian. Our services have been customized to use the services of TCA through FPI’s investment platform. We receive a portion of the advisory fee you pay to FPI. All transactions and back office functions are performed or provided by FPI and TCA.

Personalized Asset Management Program assets will be held by a qualified custodian that you select. We have contracted with Argentus Capital Management, LLC to provide back office and trade execution. Please refer to the *Program Brochure* for more information.

Our recommendation of a specific custodian is based in part on our existing relationships; the custodian’s financial strength; reputation; breadth of

investment products; and, the cost and quality of custody and brokerage services provided to you and our other clients.

The determining factor in the selection of a particular custodian to execute transactions for your accounts is not the lowest possible transaction cost, but whether they can provide what is in our view the best qualitative execution for investment transactions for your account.

We are independently owned and operated and not affiliated with the custodian we recommend. In addition to brokerage and custody services, we may receive benefits from the custodians we recommend, including access to investments generally available to institutional investors; research; software; and, educational opportunities. Custodians may also make available or arrange for these types of services to be provided to us by independent third parties. Custodians may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the fees of a third party providing these services to us.

We receive economic benefits as a result of our relationship with Custodians because we do not have to produce or purchase the products and services listed above. These services are not contingent upon us committing any specific amount of business to the Custodians in trading commissions. We do not enter into soft-

dollar arrangements with custodians or brokers.

Because the amount of products or services we receive may vary depending on the custodian we recommend to be used by our clients and the amount of client assets in accounts at that custodian, we may have a conflict of interest in making that recommendation. Our recommendation of specific custodians may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

The custodians do not charge separately for holding our client accounts, but may be compensated by you through other transaction-related fees associated with the securities transactions they execute for your account.

Commissions and other fees for transactions executed through the custodians we recommend may be higher than commissions and other fees available if you use another custodian firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by our recommended custodians outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial

number of our accounts, including accounts not maintained through our recommended custodians. We do not attempt to allocate these benefits to specific clients.

Additionally, we may receive:

- financial assistance for conferences,
- sales or employee training programs,
- travel and lodging expenses for meetings and seminars, and
- gifts of nominal value from various broker-dealers, trust companies, mutual funds, insurance companies, and other investment advisers as permitted under applicable regulations.

Directed Brokerage

If you participate in the Personalized Asset Management Program, you may not direct us to execute transactions away from your account custodian.

Bunched Trading

We may engage in “bunched trading,” which is the purchase or sale of a security for the accounts of multiple clients in a single transaction. If a bunched trade is executed, each participating client receives a price that represents the average of the prices at which all of the transactions in a given bunch were executed.

Executing a bunched trade allows transaction costs to be shared equally and

on a pro rata basis among all of the participating clients. If the order is not completely filled, the securities purchased or sold are distributed among participating clients on a pro rata basis or in some other equitable manner.

Bunched trades are placed only when we reasonably believe that the combination of the transactions provides better prices for clients than had individual transactions been placed for clients.

Transactions for the accounts of our employees may be included in bunched trades. They will receive the same average price and pay the same commissions and other transaction costs, as clients.

Transactions for the accounts of our employees will not be favored over transactions for client accounts.

We are not obligated to include any client transaction in a bunched trade. Bunched trades will not be effected for any client's account if doing so is prohibited or otherwise inconsistent with that client's investment advisory agreement. No client will be favored over any other client.

Review of Accounts

We regularly monitor our models, as well as general conditions in the stock and bond markets, and recommend changes

and/or alternate investments or opportunities when we believe it is appropriate to do so. We strongly encourage you to notify your financial advisor of any material changes in your overall financial condition or your investment objectives or risk tolerance as these could have a material effect on the recommendations made to you.

Dina Fliss, President, is responsible for conducting all model reviews.

While you will generally meet with your financial advisor, we may arrange for one or more other advisers who have particular subject matter expertise to also meet with you.

You will receive statements from your account custodian, or your variable annuity and life insurance carrier at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values.

You will receive confirmations and quarterly statements from your custodian for all of the transactions FPI effects for your Flexible Plan account. You will also receive quarterly reports from FPI.

GVCN will provide quarterly reports for your Personalized Asset Management Program accounts. Please refer to the Program Brochure for more complete information.

Advice Direct participants will receive an initial allocation recommendation, and

quarterly recommendations thereafter. GVCM will not review your account or provide reports. We encourage you to review your account with your financial consultant and to update your Advice Direct profile when appropriate so that our recommendations may be tailored to your current situation. You will receive at least quarterly statements from your account custodian.

Client Referrals and Other Compensation

We receive certain economic benefits as a result of our participation in FPI's wrap program. We also receive certain benefits from our participation in the institutional programs of the custodians we may recommend. Those benefits are described in detail in the preceding section entitled "Brokerage Practices."

We may enter into written agreements with certain unaffiliated investment advisers and other professionals (such as CPAs, attorneys, etc.) to compensate them for referring clients to us. We will pay these individuals (referred to as "solicitors") a percentage of the advisory fee that you pay us if it is determined that you have become a client of ours as a result of their direct or indirect efforts.

The payments we make to a solicitor will not result in an increase in the amount of the advisory fee that the referred client will pay.

Our solicitation or referral arrangements will comply with applicable laws that

govern:

- the nature of the services provided;
- the fees to be paid;
- disclosure of solicitor arrangements to clients; and
- client consents, as required.

Custody

Your assets will be held by a qualified custodian. We do not have physical custody of your account but we may be deemed to have custody when you authorize us to deduct our fees directly from your account. You will receive statements from your account custodian or your variable annuity and life insurance carrier on at least a quarterly basis. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact us or your solicitor should you have any questions or concerns regarding your account.

Investment Discretion

We offer our advisory services on a discretionary basis. This means that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for our model portfolios. We do not have the authority to withdraw funds from your account. We may only exercise discretion if you have provided that authority to us

in writing. This authorization is typically included in the investment management agreement you enter into with us.

The discretionary authority you grant to us does not provide us the ability to choose the custodian through which transactions for your account will be executed or to negotiate brokerage fees or expenses. Additionally, our discretionary authority does not provide us the ability to withdraw funds from your account (other than to withdraw our advisory fees which may only be done with your prior written authorization).

We will exercise discretion in a manner consistent with the stated investment objectives for your account.

Typically under third-party investment management arrangements, the third-party investment manager exercises discretion in the management of your account. All securities transactions are selected and executed by that manager. We do not manage or obtain discretionary authority over the assets in those accounts. You may, however, grant us the discretionary authority to hire and fire such third-party managers on your behalf.

Voting Client Securities

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested.

Certain third party asset managers on the Personalized Asset Management Program platform may vote the proxies for the securities in the portfolios they manage.

Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.

GLOBAL VIEW CAPITAL



Dina L. Fliss

CRD #1358397

*Stone Ridge III Business Center
N14 W23833 Stone Ridge Drive, Suite 350A
Waukesha, WI 53188
262.650.1030*

Brochure Supplement

March 18, 2013

This brochure supplement provides information about Dina Fliss that supplements the Global View Capital Management, LTD brochure. You should have received a copy of that brochure. Please contact James F. Wawrzyniakowski, Jr., if you did not receive Global View Capital Management, LTD's brochure or if you have any questions about the contents of this supplement. Additional information about Dina Fliss is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience



Dina Louise Fliss
CRD #1358397

Year of birth: 1958

Formal education after high school:

University of Wisconsin, attended 1977 - 1980

Business background:

- Global View Capital Management, LTD, President (02/11 to Present)
- Global View Capital Insurance, LTD, Vice-President (02/11 to Present)
- The Strategic Financial Alliance, Inc., Registered Representative (11/10 to Present)
- Bay Ventures, LLC, Member (05/02 to Present)

- Investment Advisors International, Executive Director (07/06 to 11/10)
- World Group Securities, Inc., Registered Representative (02/02 to 11/10)
- World Financial Group, Associate (06/01 to 11/10)
- City First Mortgage Services, Loan Originator (08/08 – 06/10)
- Innergy Lending, LLC, Loan Originator (06/06 – 06/08)

Disciplinary Information

Dina Fliss has not been the subject of any legal or disciplinary event initiated by a governmental entity or regulatory body.

Other Business Activities

In addition to her association with Global View Capital Management, Ltd, Dina Fliss is also:

- a registered representative and investment adviser representative of The Strategic Financial Alliance, Inc. (a registered broker/dealer); and
- a licensed insurance agent.

If Ms. Fliss performs services for you as a registered representative or investment adviser representative of The Strategic Financial Alliance (“SFA”), Ms. Fliss may receive commissions or other compensation

from the sale of mutual funds or other products to you. We recommend no-load or load-waived mutual funds to further reduce conflicts of interest. Ms. Fliss may also earn commissions from insurance products you purchase from her.

When Ms. Fliss recommends advisory services and programs through the SFA which include GVCM models or programs, Ms. Fliss will receive compensation as an investment advisory representative in addition to the compensation GVCM receives as a portfolio manager or sub-adviser to certain programs.

This additional compensation may present a conflict of interest because it creates an incentive to recommend products and services based upon compensation, rather than on your needs. Ms. Fliss will explain the costs associated with any recommendations she makes. You have no obligation to do business with Ms. Fliss in any of these capacities.

Additional Compensation

Ms. Fliss may receive additional compensation for her activities as a registered representative of a broker-dealer and as an insurance agent. This compensation is described under “Other Business Activities” above. This may also include applicable sales awards and other prizes.

Supervision

Ms. Fliss is the President of Global View Capital Management, Ltd. Ms. Fliss is required to adhere to our processes and procedures as described in our firm’s Code of Ethics. Her personal trading and other activities are reviewed by James F. Wawrzyniakowski, Jr., Chief Compliance Officer. He can be reached at 262.650.1030.

GLOBAL VIEW CAPITAL



James F. Wawrzyniakowski, Jr. CPA

CRD #4061554

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Brochure Supplement

March 18, 2013

This brochure supplement provides information about James F. Wawrzyniakowski, Jr. that supplements the Global View Capital Management LTD brochure. You should have received a copy of that brochure. Please contact James F. Wawrzyniakowski, Jr., if you did not receive Global View Capital Management, LTD's brochure or if you have any questions about the contents of this supplement. Additional information about James F. Wawrzyniakowski, Jr., is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

James F. Wawrzyniakowski, Jr. CPA

CRD #4061554

Year of birth: 1967

Formal education after high school:

University of Wisconsin - Milwaukee,
BBA – Accounting, 1995

Business background:

- Global View Capital Management, LTD, Chief Compliance Officer (12/11 to Present)
- MetLife, Inc., Registered Representative/Investment Adviser Representative (08/08 to 12/11)
- U.S. Bancorp Fund Services, LLC, Compliance Officer (07/07 to 02/08)
- Robert W. Baird & Co. Inc., Vice President/Compliance Officer/Risk Management Analyst (06/02 to 07/07)
- Robert W. Baird & Co. Inc., Senior Internal Auditor (10/99 to 05/02)
- Badger Meter, Inc., Accountant II (06/97 to 10/99)
- Reilly, Penner, & Benton LLP, Staff Accountant/Auditor (01/96 to 05/97)
- Goldi, Inc., Accountant (06/95 to 12/95)

- United States Marine Corps, Platoon Sergeant/Platoon Commander (05/85 to 05/95)

Professional Designations

Certified Public Accountant (CPA)

A CPA license is legally required in order to do particular jobs, such as public accounting (independent auditing). State laws govern what CPAs can and cannot do with their license.

Requirements vary by state, but in general, in order to sit for the CPA exam, applicants must have a bachelor's degree with 120 semester hours. To obtain the CPA designation, applicants must pass the Uniform CPA Exam, gain relevant work experience and meet additional educational requirements.

Overall, additional educational requirements usually consist of 24-30 semester hours in accounting, earned through a graduate or bachelor's degree in business. Many states also require a minimum number of one to two years accounting and/or auditing experience.

Aside from the experience requirements, a CPA license usually takes about 18 months to complete beyond the educational requirements. Many students choose to pursue a masters degree in accounting to fulfill their educational requirements.

Although classroom requirements are a

major requirement, the CPA exam is a difficult task in its own right. Exams are administered by the American Institute of Certified Public Accountants, the governing body of CPAs in the United States. The 14-hour computerized exam consists of four sections:

- Auditing and attestation
- Financial accounting and reporting
- Regulation
- Business environment and concepts

Disciplinary Information

James F. Wawrzyniakowski, Jr., has not been the subject of any legal or disciplinary event initiated by a governmental entity or regulatory body.

Other Business Activities

In addition to his association with Global View Capital Management, Ltd, James F. Wawrzyniakowski, Jr. is also:

- a registered representative and investment adviser representative of The Strategic Financial Alliance, Inc. (a registered broker/dealer); and
- a licensed insurance agent.

If Mr. Wawrzyniakowski performs services for you as a registered representative or investment adviser representative of The Strategic

Financial Alliance, Mr. Wawrzyniakowski may receive commissions or other compensation from the sale of mutual funds or other products to you. (We recommend no-load or load-waived mutual funds to further reduce conflicts of interest.) Mr. Wawrzyniakowski may also earn commissions from insurance products you purchase from him.

This additional compensation may present a conflict of interest because it creates an incentive to recommend products and services based upon compensation, rather than on your needs. Mr. Wawrzyniakowski will explain the costs associated with any recommendations he makes. You have no obligation to do business with Mr. Wawrzyniakowski in any of these capacities.

Additionally, Mr. Wawrzyniakowski is the designated supervisor for the advisory representatives of The Strategic Financial Alliance, Inc., who are also associated with Global View Capital Advisors, an affiliated marketing organization.

Additional Compensation

Mr. Wawrzyniakowski may receive additional compensation for his activities as a registered representative of a broker-dealer and as an insurance agent. He also is compensated for his supervisory responsibilities. This compensation is described under

“Other Business Activities” above.
This may also include applicable sales
awards and other prizes.

Supervision

James F. Wawrzyniakowski, Jr. is the
Chief Compliance Officer of Global

View Capital Management, Ltd. He is
required to adhere to our processes and
procedures as described in our firm’s
Code of Ethics. His personal trading
and other activities are reviewed by
Dina Fliss, President. Ms. Fliss can be
reached at 262.650.1030.