

Firm Brochure
(Part 2A of Form ADV)

UNITED GLOBAL ADVISORS, LLC

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This brochure provides you with information about the qualifications, business practices, and nature of advisory services of United Global Advisors, LLC, all of which should be considered before becoming an advisory client of our Firm. Please contact Brent S. Gillett, Chief Compliance Officer, if you have any questions about this narrative brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

Additional information about our Firm is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Our Firm's CRD number is 167809.

May 7, 2013

Item 2 Material Changes

The SEC adopted “Amendments to Form ADV” in July 2010. This Part 2A of Form ADV (“Firm Brochure”), dated **May 7, 2013**, is our initial disclosure document prepared in accordance to the SEC’s requirements and rules. As you will see, this document is in narrative format. Consistent with the rules, we will ensure that you receive a summary of any material changes to this and subsequent Firm Brochures within 120 days of the close of our business’ fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Material Changes since the Last Update

This section of our Brochure will reflect the update of any material changes that occur subsequent to the delivery of our Firm Brochure.

We may, at any time, update this Brochure.

Full Brochure Available

Pursuant to new SEC rules, you will receive a summary of any material changes to the Brochure, and any subsequent versions of the Brochure within 120 days of the close of our business fiscal year, which is December 31st. We will provide you with a new version of the Brochure as necessary based on changes or new information, at any time, without charge. Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at **310-922-8955** or by email at: brent@gillett.com.

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Item 4 Advisory Business

A. Firm Description

United Global Advisors, LLC, (“UNITED GLOBAL”, or “the Firm”) is an investment management firm that is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. The Firm is organized as a California limited liability corporation that was founded in 2013. UNITED GLOBAL’s current business activities consist primarily of the management of securities portfolios focused on capital appreciation.

Principal Owner: Brent S. Gillett owns 100% of the Firm.

B. Types of Advisory Services

UNITED GLOBAL provides discretionary portfolio management services where the investment advice provided is custom tailored to meet the needs and investment objectives of the specific client. Subject to any written guidelines, which the client may provide, the Firm will be granted discretion and authority to manage the account. Accordingly, UNITED GLOBAL is authorized to perform various functions, at the client’s expense, without further approval from the client. Such functions include the determination of securities to be purchased or sold and the amount of securities to be purchased or sold.

C. Tailored Relationships

The asset management services offered by UNITED GLOBAL are based on the individual needs of our clients and the suitability of products and services. We make a thorough assessment of our client’s goals, objectives, investment horizon, and risk tolerance.

D. Wrap Fee Programs

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions and affiliated and unaffiliated investment advisers through which the Clients of such firms receive discretionary investment advisory, execution, clearing and custodial services in a “bundled” form. In exchange for these “bundled” services, the Clients pay an all-inclusive (or “wrap”) fee determined as a percentage of the assets held in the wrap account. UNITED GLOBAL does not participate in and is not a sponsor of any wrap fee program(s).

E. Assets under Management

When calculating regulatory assets under management, an Investment Adviser must include the value of any client account over which it exercises continuous and regular supervisory or management services. As of the date of this Brochure, UNITED GLOBAL does not have assets under management because the Firm currently has no clients and therefore no assets. However, it is expected that UNITED GLOBAL will have assets in the future. UNITED GLOBAL will amend its Form ADV and Part 2A of the Form ADV as required to disclose its assets under management.

Item 5 Fees and Compensation

A. Advisory Fees

UNITED GLOBAL earns its fees and compensation by providing personalized discretionary asset management services.

UNITED GLOBAL will assess a management fee (the “Management Fee”) to provide discretionary portfolio management services. The management fee is an annual fee based on a percentage of the client’s assets under management.

Clients are assessed an annual asset management fee of 1.0% (per annum). The fee is billed quarterly in arrears.

B. Billing

The Management Fee is payable in arrears on the first business day following the prior quarter, and is calculated before any accrual for or payment of the Management Fee. The account value is calculated using the Average Daily Balance over the relevant prior quarter.

The payment of fees will be debited from the client’s account in accordance with the Investment Management Agreement, and are paid by the qualified custodian holding the client’s funds and securities. The client will provided written authorization permitting the fees to be paid directly from the account.

UNITED GLOBAL reserves the right to discount fees based on the needs and circumstances of clients. All of the above-referenced fees are negotiable.

C. Other Fees & Expenses

There may be additional fees or charges that result from the maintenance of or trading within your account. These are fees are imposed by third parties in connection with investments made through the your account, including but not limited to, no-load mutual fund 12(b)-1 distribution fees, certain deferred sales charges on previously purchased mutual funds, and IRA and Qualified Retirement Plan fees.

D. Refund Policy

Clients may request to terminate their advisory contract with UNITED GLOBAL, in whole or in part, by providing advanced written notice. Either party may terminate the investment advisory contract by providing ten (10) days written notice to UNITED GLOBAL. In the event of termination, fees are prorated from the date of last billing to the date of notice of termination. Upon termination of account, by either party, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees for any unbilled portion of a month will be collected prior to disbursement of funds.

E. Other Compensation

UNITED GLOBAL does not receive any compensation other than the management fees for providing investment advisory services to its Clients.

Item 6 Performance-Based Fees and Side-by-Side Management

Performance-Based Fees (“Performance Fees”) are based on a share of the capital gains or capital appreciation of the assets of a client. Fees based on performance means UNITED GLOBAL participates directly in the account’s results. The Performance Fee may, indirectly, create an incentive for the Firm to make investments on behalf of the client that are riskier or more speculative than would be the case in the absence of such a fee.

Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

UNITED GLOBAL does not assess Performance-Based Fees and does not conduct side-by-side management of dissimilar advisory accounts.

Item 7 Types of Clients

A. Types of Clients

UNITED GLOBAL provides discretionary management services to different types of clients. We generally provide advice to individuals seeking diversification of assets through specialized allocation strategies.

B. Conditions for Account Management

UNITED GLOBAL does not require the client to have a minimum investment amount to open and/or to maintain an account with it.

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

A. Methods of Analysis

UNITED GLOBAL employs fundamental analysis and technical analysis as our primary methods for analyzing securities to achieve the investment objectives and goals of our client portfolios.

Fundamental analysis involves analyzing its financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives: to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions; and to calculate its credit risk. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating stock.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. The technical indicators that the fund may consider include, but are not limited to, price, volume, momentum, relative strength, sector/group strength and moving averages. Technical analysis does not consider the underlying financial condition of a company. This presents a risk that a poorly-managed or financially unsound company may underperform regardless of market movement.

B. Investment Strategies

UNITED GLOBAL may utilize the following investment strategies when implementing investment advice given to clients:

Long Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen long-term changes in the company in which you are invested or in the overall market.

Short Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. We may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk.

Trading - securities purchased with the expectation that they will be sold within a very short period of time, generally within 30 days. Trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk. Frequent trading strategies may be used occasionally in an effort to capture significant market gains and avoid significant losses during a volatile market. However, frequent trading can negatively affect investment performance, particularly through increased brokerage and other transactional costs and taxes.

Balance Strategy - A portfolio allocation and management method aimed at balancing risk and return. Such portfolios are generally divided equally between equities and fixed-income securities. Although the balanced investment strategy aims to balance risk and return, it does carry more risk than those strategies aiming at capital preservation or current income. In other words, the balanced investment strategy is a somewhat aggressive strategy, and is suitable for those investors who have some tolerance for risk with a longer time horizon (generally over five years).

Long Term Buy and Hold - Buy and hold is a long term investment strategy based on the view that in the long run financial markets give a good rate of return despite periods of volatility or decline. This viewpoint also holds that short term market timing (the concept that one can enter the market on the lows and sell on the highs) does not work for small accounts or inexperienced investors, so it is better to simply buy and

hold. The risk involved with this type of strategy is that, if you need your money in the short term, you may not be able to wait for the market to recover from a downturn.

C. Material Risks of Methods of Analysis and Investment Strategies

Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

Every method of analysis has its own inherent risks. To perform an accurate market analysis UNITED GLOBAL must have access to current/new market information. UNITED GLOBAL has no control over the dissemination rate of market information; therefore, unbeknownst to UNITED GLOBAL, certain analyses may be compiled with outdated market information, severely limiting the value of UNITED GLOBAL's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by UNITED GLOBAL) will be profitable or equal any specific performance level(s). UNITED GLOBAL does not represent, warrant, or imply that the services or methods of analysis employed by UNITED GLOBAL can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

Notwithstanding the method of analysis or investment strategy employed by our Firm, the assets within your portfolio are subject to risk of devaluation or loss. UNITED GLOBAL wants you to be aware that there are many different events that can affect the value of your assets or portfolio including, but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

Although UNITED GLOBAL's methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. We want you to understand that there are inherent risks associated with investing and depending on the risk occurrence; you may suffer LOSS OF ALL OR PART OF YOUR PRINCIPAL INVESTMENT.

D. Recommendation of Specific Types of Securities

UNITED GLOBAL does not primarily recommend a particular type of security. Investments may include, but are not limited to, exchange listed securities, fixed-income securities, over-the-counter securities, foreign securities, options, derivatives, money market funds or other pooled investment vehicles.

Item 9 Disciplinary Information

The Firm is required to disclose whether there are legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. UNITED GLOBAL and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10 Other Financial Industry Activities and Affiliations

A. Financial Industry Activities

UNITED GLOBAL is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Furthermore, none of UNITED GLOBAL's management or supervised persons is as a registered representative or has an application pending to register as representatives of a broker-dealer.

B. Financial Industry Affiliations

UNITED GLOBAL is not a registered, Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, none of UNITED GLOBAL's management or supervised persons is registered as, or has applications pending to register as an associated person of the foregoing entities.

C. Other Material Relationships

Brent S. Gillett, the principal owner of UNITED GLOBAL, also works as an attorney. There are no conflicts of interest as none of UNITED GLOBAL's clients are clients of Mr. Gillett's law practice. Furthermore, clients of Mr. Gillett's law practice will not be solicited to become clients of UNITED GLOBAL.

UNITED GLOBAL does not have any arrangements that are material to its advisory or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein.

D. Other Investment Advisers

UNITED GLOBAL does not have any arrangements that are material to its advisory or its clients with other investment advisers.

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

A. Code of Ethics

All employees of UNITED GLOBAL must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, UNITED GLOBAL has determined to adopt a Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or at least the potential for or the appearance of such a conflict), and to establish reporting requirements and enforcement procedures relating to personal trading by UNITED GLOBAL personnel. UNITED GLOBAL's Code of Ethics, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. Participation of Interest in Client Transactions

UNITED GLOBAL does not recommend or effect transactions in securities which any related person may have material financial interest.

C. Proprietary and Simultaneous Trading

We at UNITED GLOBAL often buy and sell securities for our own accounts that we have also recommend to clients. UNITED GLOBAL will not intentionally favor a proprietary account over a Client account, nor will it knowingly permit a proprietary account to trade ahead of a Client account unless the client's investment strategy or objective is deemed to be a "buy and hold". That is, the client's objective may be not to raise too much cash at any given time or the client may prefer not to have their securities offered into the market. UNITED GLOBAL will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, we will monitor our proprietary and personal trading reports for adherence to our Code of Ethics.

From time to time, representatives ("related persons") of UNITED GLOBAL may buy or sell securities for themselves at or around the same time as Clients. In any instance where similar securities are being bought or sold, we will uphold our fiduciary duty by always transacting on behalf of our Client before transacting for our own benefit. At the time an order is submitted on both competitive and negotiated deals, UNITED GLOBAL will document the order to the broker/dealer as "Class 1" (client orders) and "Class 2" (proprietary/related person orders). A full allotment will result in each class receiving the documented order; a partial allotment shall be distributed on a percentage basis.

Item 12 Brokerage Practices

A. Selection and Recommendation

UNITED GLOBAL will generally recommend broker-dealers or custodians that it has established arrangements or agreement. UNITED GLOBAL will allow clients to maintain accounts at any brokerage firm.

In instances where UNITED GLOBAL has discretion with respect to broker-dealer selection, UNITED GLOBAL will seek “best execution” for each trade, which is a combination of price, quality of execution and other factors. In making brokerage determinations, UNITED GLOBAL will consider a number of judgmental factors, including, without limitation: 1) clearance and settlement capabilities; 2) quality of confirmations and account statements; 3) the ability of the broker to settle the trade promptly and accurately; 4) the financial standing, reputation and integrity of the broker-dealer; 5) the broker-dealer’s access to markets, research capabilities, market knowledge, and any “value added” characteristics; 6) UNITED GLOBAL’s past experience with the broker-dealer; 7) UNITED GLOBAL’s past experience with similar trades; and 8) any other factors. Recognizing the value of these factors, clients may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction. UNITED GLOBAL recognizes that “Best execution” is not synonymous with lowest brokerage commission.

B. Soft Dollar Benefits

UNITED GLOBAL does not currently generate “soft dollars.” It and when it does, UNITED GLOBAL intends to comply with the “safe harbor” of Section 28(e) of the Securities Exchange Act of 1934, as amended. Under “soft dollar” arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items for the benefit of UNITED GLOBAL. These soft dollar arrangements may benefit UNITED GLOBAL by reducing its expenses. Nonetheless, UNITED GLOBAL believes that to the extent it makes allocations to brokerage business with soft dollar arrangements, this would generally enhance the ability to obtain research, optimal execution and other benefits on behalf of our clients.

C. Brokerage for Client Referrals

When recommending broker-dealers to clients, the Firm does not consider whether it receives client referrals from a broker-dealer or third party.

D. Directed Brokerage

UNITED GLOBAL will generally recommend to clients the certain broker-dealers or custodians, but the decision regarding broker-dealer or custodian will be made by the client a prior to entering into the advisory agreement. This arrangement is designed to maximize efficiency and to be cost effective to our clients. By requiring Clients to use our specific custodian, we seek to achieve most favorable execution of Client transactions. UNITED GLOBAL reserves the right to change the recommended custodian at any time it deems said custodian is not the custodian most favorable to its clients.

UNITED GLOBAL permits clients to direct the use a particular brokerage firm. If a client directs brokerage, UNITED GLOBAL cannot negotiate commission rates, UNITED GLOBAL will however use its best efforts to negotiate the most favorable rates based on the size and the anticipated trading activity in the account. As a result of such directed brokerage, clients may pay higher brokerage commissions than might otherwise be paid if UNITED GLOBAL were granted discretion to select a broker to handle the account. In addition, clients might lose the benefits of potentially better executions available through bunched transactions of the recommended broker-dealer custodian.

B. Order Aggregation

UNITED GLOBAL may, at times, aggregate sale and purchase orders of securities for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively with better purchase or sale execution prices, lower commission expenses or beneficial timing of transactions or a combination of these and other factors. Our policies and procedures mandate aggregating multiple orders. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. UNITED GLOBAL may aggregate or “bunch” transactions for a client’s account with those of other clients in an effort to obtain the best execution under the circumstances.

Item 13 Review of Accounts

A. Periodic Reviews

UNITED GLOBAL reviews its client’s account activity on a continual basis to determine their conformity with investment objectives and guidelines. For further due diligence, the portfolios will be assessed no less than quarterly for factors such as risk evaluation, tax treatment, performance relative to the indices and liquidity needs of each client. The reviews are conducted by Brent S. Gillett, the Firm’s Chief Compliance Officer.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in your financial status (such as retirement, termination of employment, relocation, or inheritance).

Clients are advised to notify UNITED GLOBAL promptly if there are any materials changes in their financial situation, investment objectives, or in the event they wish to place restrictions placed on their account.

C. Client Reports

UNITED GLOBAL does not issue separate client reports. Clients will receive reports at least quarterly from the account custodian detailing the account performance and holdings.

Item 14 Client Referrals and Other Compensation

A. Economic Benefits for Client Referrals

The Firm does not receive and does not have any arrangement with third parties to receive economic benefits (such as sales awards or other prizes) for providing investment advice or other advisory services to its clients.

B. Referral Compensation to unaffiliated Third Parties

The Firm nor any of its related persons does not compensate directly or indirectly any person who is not a supervised person for client referrals.

Item 15 Custody

A. Custodian of Assets

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

Physical custody of our client's funds and securities are held by an UNITED GLOBAL preferred qualified custodian. UNITED GLOBAL does not take physical custody of client assets and/or securities under any circumstances. Client funds and securities are held by the qualified custodian.

As noted, the physical assets are held in an account with the Firm's qualified custodian.

UNITED GLOBAL has indirect custody of funds or securities by virtue the ability to have its advisory fees debited by the custodian on a quarterly basis. Prior to permitting direct debit of fees, the client provides written authorization permitting fees be made direct from the custodian. As part of the billing process, the custodian is advised of the amount of the fee to be deducted from that account. On at least a quarterly basis, the custodian is required to send the client a statement showing all transactions within the account during the reporting period.

B. Account Statements

Although we are your advisor, your statements will be mailed by the account broker-dealer or custodian. When you receive these statements, please review the statements carefully. Please compare asset values, holdings, and fees to the account statement issued for the previous period.

Item 16 Investment Discretion

It is UNITED GLOBAL's customary procedure to have full discretionary authority in order to supervise and direct the investments of your accounts. You grant this authority upon execution of our Investment Management Agreement. This authority is for the purpose of making and implementing investment decisions, without your prior consultation. All investment decisions are made in accordance with your stated

investment objectives. You may inform our Firm of restrictions that you would like to impose regarding investment strategies or types of securities transactions within your account(s). Our discretionary authority does not give authority to take or have possession of any assets in your account or to direct delivery of any securities or payment of any funds held in the account to our Firm. Furthermore, our authority by agreement does not allow us to direct the disposition of such securities or funds to anyone except the account owner.

Item 17 Voting Client Securities

Fiduciary obligations of prudence and loyalty require an investment adviser with proxy voting responsibility to vote proxies on issues that affect the value of the client's investment. Proxy voting decisions must be made solely in the best interests of the client's account.

Clients retain the right to vote all proxies which are solicited for securities held in their accounts. UNITED GLOBAL will not take nor be required to take any action or render any advice with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the client's account may be invested in occasionally. Furthermore, UNITED GLOBAL will not take any action or render any advice with respect to any securities held in any client's accounts that are named in or subject to class action lawsuits. UNITED GLOBAL will however, forward to you any information received by our Firm regarding class action legal matters involving any security held in your account.

Item 18 Financial Information

A. Balance Sheet Requirement

UNITED GLOBAL does not require or solicit prepayment of more than \$1200 in advisory fees per client, six month or more in advance.

B. Financial Condition

The Firm does not have any financial impairment that will preclude it from meeting contractual commitments to clients.

C. Bankruptcy Petition

Neither the Firm nor its management has been the subject of a bankruptcy petition at any time during the last 10 years.

Privacy Policy

UNITED GLOBAL does not disclose nonpublic personal information about its clients or former clients to any persons other than as described below. UNITED GLOBAL collects information about its clients (such a name, address, social security number, assets and income) from discussions with clients, from documents that clients may deliver to UNITED GLOBAL (such as account applications) and in the course of providing services. In order to service its client accounts and effect client transactions, UNITED GLOBAL may provide client personal information to its affiliates and to firms that assist it in servicing client accounts and which have a need for such information. UNITED GLOBAL does not otherwise provide information about its clients to outside firms, organizations or individuals except as required by law. Any party that receives this information will use it only for the services and as allowed by applicable law or regulations, and is not permitted to share or use this information for any other purpose.