

## Item 1 Cover Page

Foresight Global Investors, Inc.  
2900 Westchester Ave., Suite 100  
Purchase, NY 10577  
[www.foresightgi.com](http://www.foresightgi.com)

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**This brochure provides information about the qualifications and business practices of Foresight Global Investors, Inc. If you have any questions about the contents of this brochure, please contact us at (914) 253-8809. 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. Registration as a registered investment advisor does not imply a certain level of skill or training.**

**Additional information about Foresight Global Investors, Inc. also is available on the SEC's website at <http://www.adviserinfo.sec.gov>.**

## **Item 2 Material Changes**

There have been no material changes to this Brochure since the date of the last annual update noted below.

The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was March 30, 2018.

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#### **Item 4 Advisory Business**

Foresight Global Investors, Inc. is a registered investment advisor firm registered with the Securities and Exchange Commission (“SEC”) since October 23, 2015.

The principal owner of Foresight Global Investors, Inc. is Ajay Mehra, President.

##### Advisory Services

Foresight Global Investors, Inc.’s (“Foresight Global” or “Advisor”) principal service is providing fee-based investment advisory services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client’s objectives. The Advisor’s primary approach is fundamental bottom up analysis aimed at reducing risk and increasing performance. The Advisor may use exchange listed securities, over-the-counter securities, foreign securities, options on securities, and futures contracts to accomplish this objective. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client’s risk tolerance.

Foresight Global will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Foresight Global accept or maintain custody of a client’s funds or securities except for authorized fee deduction.

Foresight Global will tailor its advisory services to its client’s individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client’s requirements.

Foresight Global does not provide portfolio management services to wrap fee programs.

As of March 21, 2019, Foresight Global had \$213,033,194 in discretionary client assets under management and \$17,346,690 in non-discretionary assets under management.

## Item 5 Fees and Compensation

### Asset Management Fees

Pursuant to an investment advisory contract signed by each client, the client will pay Foresight Global an annual management fee shown in the table below, payable quarterly in arrears, based on the value of portfolio assets of the account on the last business day of the preceding quarter. New account fees will be prorated from the inception of the account to the end of the first month.

Assets Under Management	% Per Annum
First US\$15 Million	1.00
Next US\$10 Million	0.85
Next US\$50 Million	0.70
Next US\$75 Million	0.55
Thereafter	0.50

These fees may be negotiated at the sole discretion of the Advisor. Asset management fees will be directly deducted from the client account on a quarterly basis by the qualified custodian. The client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian and the custodian will send a statement at least quarterly statement to the client showing all transaction activity during the period. Where it is not practical to deduct fees directly from the client account, client will be sent an invoice on a quarterly basis for any outstanding advisory fees due.

Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisor's fee is separate and distinct from the custodian and execution fees.

Neither Foresight Global nor its supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Foresight Global does not charge performance-based fees.

## Item 7 Types of Clients

The Advisor will offer its services to individuals, banks or thrift institutions, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

The Advisor's cumulative minimum account requirement for opening and maintaining an account is \$250,000. However, the Advisor may, at its sole discretion, accept accounts with a lower value.

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

The Advisor primarily utilizes fundamental analysis techniques in formulating investment advice or managing assets for clients.

Fundamental analysis of businesses 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.

The investment strategies the Advisor will implement includes long-term purchases of securities. Use of options such as covered options, uncovered options or spreading strategies may be utilized.

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

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.). Clients need to be aware that investing in securities involves risk of loss of some or all of their investment that clients need to be prepared to bear.

Risks of fundamental analysis may include risks that market actions, natural disasters, government actions, world political events or other events not directly related to the price or valuation of a specific company's fundamental analysis can adversely impact the stock price of a company causing a portfolio containing that security to lose value. Risks may also include that the historical data and projections on which the fundamental analysis is performed may not continue to be relevant to the operations of a company going forward, or that management changes or the business direction of management of the company may not permit the company to continue to produce

metrics that are consistent with the prior company data utilized in the fundamental analysis, which may negatively affect the Advisor's estimate of the valuation of the company.

The Advisor does not primarily recommend a particular type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

### **Item 9 Disciplinary Information**

Neither Foresight Global nor its management persons have had any legal or disciplinary events, currently or in the past.

### **Item 10 Other Financial Industry Activities and Affiliations**

Neither Foresight Global nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Foresight Global nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Foresight Global does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund" and offshore fund), financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Ajay Mehra, President is also registered as an Investment Advisor Representative of Mid Atlantic Financial Management, Inc., an SEC registered investment advisor firm (SEC# 801-21527). Mid Atlantic Financial Management, Inc. has an affiliated broker-dealer, Mid Atlantic Capital Corporation (SEC# 8-27663), which Foresight Global will recommend to its clients for trading and execution services. Mr. Mehra is not a registered representative of the broker-dealer. Mr. Mehra will receive ordinary and customary compensation for the services he provides as an Investment Advisor Representative of Mid Atlantic Financial Management, but neither Mr. Mehra, nor Foresight Global receive any other direct or indirect compensation from the Mid Atlantic entities for activities concerning clients of Foresight Global. Clients of Foresight Global are not

required to utilize the services of Mid Atlantic Capital Corporation, and except for certain executives and owned entities of Mid Atlantic, there are no clients common to both Mid Atlantic Financial Management and Foresight Global. Foresight Global does not share fees from clients with either of these entities. There is no conflict of interest between the Advisor and Mid Atlantic Capital Group or any of its related entities as a result of provision of these services.

Foresight Global does not recommend or select other investment advisers for clients.

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

Foresight Global is registered with the SEC and maintains a Code of Ethics pursuant to SEC rule 204A-1. Foresight Global has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Foresight Global deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Foresight Global are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. Foresight Global collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Foresight Global will provide a copy of the Code of Ethics to any client or prospective client upon request.

Foresight Global and/or its investment advisory representatives may from time to time purchase or sell products that they may recommend to clients. Foresight Global and/or its investment advisory representatives have a fiduciary duty to put the interests of their clients ahead of their own.

Foresight Global requires that its investment advisory representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

#### **Item 12 Brokerage Practices**

If requested by the client, Foresight Global may suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. Foresight Global will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor and client in making its suggestion.

Foresight Global does not receive research or other products or services other than execution from a broker-dealer or third party as a result of client securities transactions.

Foresight Global does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.



Foresight Global recommends that all clients use Mid Atlantic Capital Management as brokerdealer for execution and/or custodial services, although this is not a requirement to become a Foresight Global client. The broker-dealer is recommended based on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting. The client will provide authority to Foresight Global to direct all transactions through that broker-dealer in the investment advisory agreement.

As an investment advisory firm, Foresight Global has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Foresight Global's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Foresight Global may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

Foresight Global will allow clients to direct brokerage at the firm's sole discretion. Clients should be aware that if they direct Foresight Global to a particular broker-dealer for execution Foresight Global may be unable to achieve most favorable execution of client transactions. Directing brokerage may cost clients more money than if Foresight Global were to execute transactions at the broker-dealer where it has an established relationship. The client may pay higher brokerage commissions because Foresight Global may not be able to aggregate orders to reduce transaction costs or the client may receive less favorable prices.

Foresight Global may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of Foresight Global's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities

purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. Foresight Global may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

### **Item 13 Review of Accounts**

The firm reviews client accounts on an annual basis, or when conditions would warrant a review based on market conditions or changes in client circumstances. Triggering factors may include Foresight Global becoming aware of a change in client's investment objective, a change in market conditions, change of employment, or a change in recommended asset allocation weightings in the account that exceed a predefined guideline. The accounts are reviewed by Ajay Mehra, President.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from trust companies or other custodians, broker dealers and others who are involved with client accounts.

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

Foresight Global is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

Foresight Global does not directly or indirectly compensate any person who is not a supervised person for client referrals.

### **Item 15 Custody**

Foresight Global does not have custody of client funds or securities, except for the withdrawal of advisory fees directly from client accounts. However, as noted in Item 13 above, clients will receive statements not less than quarterly from the qualified custodian, and we encourage you to review those statements carefully. Any discrepancies should be immediately brought to the firm's attention.

### **Item 16 Investment Discretion**

Foresight Global generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Foresight Global.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Foresight Global will be in accordance with each client's investment objectives and goals.

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

Foresight Global may assist certain clients by voting proxies on their behalf and has adopted and implemented written Proxy Voting Policies and Procedures ("Proxy Voting Procedures") which are designed to reasonably ensure that Foresight Global votes proxies in the best interest of its clients where the adviser has voting authority.

The Proxy Voting Procedures describes how Foresight Global addresses voting authority, material conflicts of interest, voting decisions, notification to the client, and books and records requirements, and ensures that proxies are voting in the best interest of its clients.

Foresight Global acknowledges and agrees that it has a fiduciary obligation to its clients to ensure that any proxies for which it has voting authority are voted solely in the best interests and for the exclusive benefit of its clients. The Proxy Voting Procedures are intended to guide Foresight Global and its personnel in ensuring that proxies are voted in such manner without limiting Foresight Global or its personnel in specific situations to vote in a predetermined manner. These policies are designed to assist Foresight Global in identifying and resolving any conflicts of interest it may have in voting client proxies.

### **Item 18 Financial Information**

Foresight Global does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and is not required to file a balance sheet.

Foresight Global has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Foresight Global does become aware of any such financial condition, this brochure will be updated and clients will be notified.

Foresight Global has never been subject to a bankruptcy petition.