

Form ADV Part 3: Relationship Summary

Glaxis Capital Management, LLC

Introduction

Glaxis Capital Management, LLC (“GCM” or “we”) is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professional at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

What Investment Services and Advice Can You Provide Me?

Description of Services: GCM offers investment advisory services to retail investors. Our investment advisory services include: Asset Management Services.

Asset Management Services: We manage accounts on a discretionary basis. After you sign an agreement with our firm, we’re allowed to buy and sell investments in your account without asking you in advance (“discretion”). Any limitations will be described in the signed advisory agreement. We will have discretion until the advisory agreement is terminated by you or our firm. For more information, please see **Item 4 of our Form ADV Part 2A**. For more information about investment authority, please see **Item 16 of our Form ADV Part 2A**.

Limited Investment Offerings: We do not primarily recommend one type of security to clients. However, we are limited in investment selection in that we can only invest your account in securities which are available on your custodian/broker-dealer’s platform.

Account & Fee Minimums: There are no minimum investment amounts or conditions required for establishing an account managed by us.

Conversation Starters: *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What Fees Will I Pay?

Description of Principal Fees & Costs: Fees charged for our asset management services are charged based on a percentage of assets under management, billed in arrears on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of each month in the current billing period. The annual fee for asset management services will be 1.50% for account sizes under \$1 million. For account sizes over \$1 million, the annual fee for asset management services will be 1.0%. Our firm’s fees will be deducted from your advisory account, which will reduce the value of your advisory account. Because our fee is based upon the value of your account we have an incentive to recommend that you increase the level of assets in your account. When engaging us for asset management services, you will also incur other fees and expenses. The broker-dealer/custodian on your account will charge you transaction fees for executing trades in your account. You will also be charged internal fees and expenses by the funds we invest in within your account.

The exact fee and fee arrangements may vary or be different than that described above based on the number of accounts managed, total assets under management and other factors specific to the client. The specific fee arrangements for you will be specified in your advisory services agreement with us.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information about the fees we charge and the other fees and expenses you will incur, please see **Item 5 of our Form ADV Part 2A**.

Conversation Starters: *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What Are Your Legal Obligations to Me When Acting as My Investment Adviser? How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?

Standard of Conduct: When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should

understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

When we provide asset management services, we will ask that you establish an account with Charles Schwab to maintain custody of your assets and to effect trades for your account. Our recommendation to use Charles Schwab is not based solely on your interest of receiving the best execution possible. We also recommend Charles Schwab because they provide us with research, products and tools that help us manage and further develop our business operations. As a result, we do not have to pay for such benefits, which saves us money; however, these arrangements create a conflict of interest. See **Item 12 of our Form ADV Part 2A** for more information about our arrangements with Charles Schwab.

We actively manage our own personal accounts while at the same time managing your accounts and other client accounts. This creates different conflicts of interest for which we have developed procedures to mitigate and control for those conflicts. For more information see **Item 11 of our Form ADV Part 2A**.

We operate a private investment fund, Glaxis Global Partners I, LP, which pays us management fees. Recommending that you invest in this fund creates a conflict of interest due to the potential for additional revenue if you invest in the fund. You should understand that the receipt of performance-based fees creates a conflict of interest, please see **Item 6 of our Form ADV Part 2A** for more details.

Conversation Starters: *How might your conflicts of interest affect me, and how will you address them?*

How Do Your Financial Professionals Make Money?

Our financial professionals are compensated based on the revenue our firm earns from their advisory services, the amount of client assets they service, and the time and complexity required to meet a client's needs.

Additional Information: For more information about our conflicts of interest and the ways we are compensated, please see **Item 5, Item 10** and **Item 14** of our **Form ADV Part 2A**.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

No, our investment adviser representatives do not have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

Conversation Starters: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information About GCM

Additional information about us and a copy of this relationship summary are available on the Internet at <http://www.glaxisllc.com>. You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/134227>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at 941-556-5333.

Conversation Starters: *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*