

Global Trust Asset Management, LLC

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FORM ADV PART 2 BROCHURE

This brochure provides information about the qualifications and business practices of Global Trust Asset Management, LLC. If you have any questions about the contents of this brochure, please contact us at 561-472-0191. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Global Trust Asset Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Global Trust Asset Management, LLC is 143120.

Global Trust Asset Management, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

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Advisory Business

Form ADV Part 2A, Item 4

Established in 2007, Global Trust Asset Management, LLC provides investment management, financial planning, tax planning, estate planning, and retirement planning for individuals, corporations, trusts, and other entities. Global Trust Asset Management, LLC is a fee only firm, meaning that we do not work off of commissions. By being a fee-only firm, Global Trust Asset Management, LLC is able to align clients' interests with their own. The principal owners of Global Trust Asset Management, LLC are Brian J. Brescia and Edward T. Holt, Jr.

Global Trust Asset Management, LLC provides asset management services to clients. The services include the following:

- a. Investor Profile – Global Trust Asset Management, LLC consults with the client to obtain detailed financial information and other pertinent data to determine the appropriate investment guidelines, risk tolerance, and other factors that will assist in ascertaining the suitability of the asset management account.
- b. Portfolio Management Selection – Global Trust Asset Management, LLC provides asset management of clients' funds. Global Trust Asset Management, LLC diversifies and manages clients' portfolio. Investments are determined based upon client's goals, investment objectives, risk tolerance, net worth, net income, and other various suitability factors. Global Trust Asset Management, LLC manages the client's accounts on an individualized basis. Further restrictions and guidelines imposed by clients affect the composition and performance of portfolios. For these reasons, performance of portfolios within the same investment objective may differ and clients should not expect that the performance of their portfolios will be identical with the average client of Global Trust Asset Management, LLC.
- c. Performance Evaluation and Monitoring Services – Global Trust Asset Management, LLC furnishes performance measurement services to its clients. At a minimum, semi-annual performance evaluation reports are provided (or more frequently at the client's discretion). The internal reports are intended to inform clients as to the performance of their investments for the selected period.
- d. Discretionary Authority – The client will grant Global Trust Asset Management, LLC discretionary authority to buy and sell securities.

As of January 31, 2011, Global Trust Asset Management, LLC had \$63,523,499 of assets under direct management.

Fees and Compensation

Form ADV Part 2A, Item 5

Annually, Global Trust Asset Management, LLC charges a management fee based on the amount of assets under management. The percentage charged will not exceed 1.25% of assets under management. Billings will be made quarterly and will be billed in arrears. The current management fee schedule is below. Please note that for accounts with less than \$250,000 of assets under management, Global Trust Asset Management, LLC charges 1.25%. To an extent, fees are negotiable if the asset size is large enough or if other factors warrant a change in the fee structure.

FEES FOR INVESTMENT MANAGEMENT AND SUPERVISION SERVICES

<u>ASSETS UNDER MANAGEMENT</u>	<u>ANNUAL MANAGEMENT FEE</u>
Up to \$2,000,000	1.00%
On the next \$3,000,000	.75%
On the next \$5,000,000	.50%
Amounts in excess of \$10,000,000	.35%

The contract may be terminated by either party upon 30 days written notice. Upon termination, Global Trust Asset Management, LLC will charge the client a prorated fee for the time in which the client received Global Trust Asset Management, LLC's services. A refund will be provided without penalty if the client terminates the contract, in writing, within five (5) days of the contract being executed.

The client may grant Global Trust Asset Management, LLC authority to receive payments directly from the client's account. The client shall grant limited authorization to Global Trust Asset Management, LLC to withdraw the contractually agreed upon fees from the account. Global Trust Asset Management, LLC will notify the client, in writing, of the exact amount of the withdrawal and the specific manner and basis on which the fee is calculated. The custodian of the account is advised in writing of the limitation on Global Trust Asset Management, LLC's access to the account.

Other expenses that clients may incur while having their investments managed by Global Trust Asset Management, LLC include a minimal trade execution charge by the custodian (Fidelity Investments or Charles Schwab). This execution charge will vary depending on the type and quantity of the security purchased or sold. The charge will be between \$0 and \$25. Global Trust Asset Management, LLC does not receive any of these charges from the custodian.

Please note that none of Global Trust Asset Management, LLC's personnel accepts compensation for the sale of securities or any other investment products, including service fees from the sale of mutual funds. Global Trust Asset Management, LLC strives to be an independent advisor at all times and always puts the clients' interests first.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

Global Trust Asset Management, LLC does not accept performance-based fees of any kind.

Types of Clients

Form ADV Part 2A, Item 7

Global Trust Asset Management, LLC has individuals, trusts, corporations, and a VEBA as clients. A VEBA is a voluntary employees' beneficiary association authorized by Internal Revenue Code Section 501(c)(9). VEBAs are a special type of tax-exempt trust vehicle which provides employee benefits. Global Trust Asset Management, LLC has a minimum family of accounts value of \$250,000. Global Trust Asset Management, LLC may waive conditions based on the complexities of the situation and/or the needs of the client.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Global Trust Asset Management, LLC offers a program of managing assets on a discretionary basis for suitable clients. Global Trust Asset Management, LLC individualizes each client's account to his or her particular needs/goals. After an extensive interview to determine what the client's needs/goals are for his or her account, Global Trust Asset Management, LLC will prepare an Investment Policy Statement targeting the amount of equities (broken down between large capitalization, small capitalization, international, and emerging markets), fixed income (broken down between core and high yield), commodities, and real estate that the account will maintain. Global Trust Asset Management, LLC believes that asset class selection plays a large part of expected returns.

On the equity side, Global Trust Asset Management, LLC value tilts all of our portfolios to a certain degree. Clients' value tilts are different depending on facts and circumstances. Global Trust Asset Management, LLC measures value via a book value to price ratio. Value stocks have outperformed growth stocks dating back to 1927. Although for any one year, growth stocks can outperform value stocks, it is Global Trust Asset Management, LLC's belief that over many years, value stocks will outperform. As such, it is advantageous for clients to tilt their portfolios towards value. By taking a value oriented approach, Global Trust Asset Management, LLC, believes that it can and will achieve above market rate returns. On the fixed income side, Global Trust Asset Management, LLC tends to favor short-term to intermediate-term bonds. In most instances, Global Trust Asset Management, LLC does not believe going out long on the maturities of bonds is beneficial to clients. The increase in risk does not generate a large enough increase in expected returns to compensate for this.

Global Trust Asset Management, LLC chooses to minimize risk whenever possible thru adequate diversification. All client accounts will contain a wide array of equities and fixed income securities to achieve this diversification. Furthermore, Global Trust Asset Management, LLC strives to invest in a multitude of global markets. By investing in a multitude of global markets, risk is minimized as clients' accounts are not correlated strictly with one country's economy. Although our clients' accounts are well diversified, Global Trust Asset Management, LLC recognizes that clients' accounts still can have a risk of loss when faced with poor market performance. Global Trust Asset Management, LLC's clients should be prepared to bear a loss if poor market conditions exist. Global Trust Asset Management, LLC strives to minimize all losses in client accounts during such conditions.

Global Trust Asset Management, LLC further believes that the costs of investing also have a large impact on clients' returns. As such, Global Trust Asset Management, LLC is very cost conscientious when selecting investments for our clients. Global Trust Asset Management, LLC favors mutual funds with very low expense ratios, no loads, and no 12b-1 fees.

Disciplinary Information

Form ADV Part 2A, Item 9

There have been no criminal or civil actions against Global Trust Asset Management, LLC or any of its personnel. Furthermore, neither Global Trust Asset Management, LLC nor any of its personnel has had any violations of investment-related statutes or regulations.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Brian Joseph Brescia and Edward Thomas Holt, Jr. are Partners at Nowlen, Holt & Miner, P.A., a public accounting firm. From time to time, they will offer clients advice from those activities. Member Robert Wayne Hendrix, Jr. is also a Partner in Nowlen, Holt & Miner, P.A. He spends 99% of his time on those activities and considers them his primary business. Global Trust Asset Management, LLC's relationship with Nowlen, Holt & Miner, P.A. does not create a conflict of interest.

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

Form ADV Part 2A, Item 11

Global Trust Asset Management, LLC has a written Code of Ethics that covers the following areas:

Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Personal Securities Transactions, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

YOU HAVE A RIGHT TO SEE OUR CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK YOUR FINANCIAL ADVISOR AT ANY TIME.

Global Trust Asset Management, LLC does not have any conflicts of interest as it relates to client transactions.

Brokerage Practices

Form ADV Part 2A, Item 12

For those client accounts where Global Trust Asset Management, LLC provides ongoing money management and investment advice with ongoing supervision, Global Trust Asset Management, LLC maintains limited power of authority over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. This authorization is based within predetermined guidelines agreed upon by both parties. Global Trust Asset Management, LLC may determine that it is in the client's best interest to maintain the asset management account with a custodian selected by Global Trust Asset Management, LLC. The custodian is suggested based on factors including transaction fees and reliability. Global Trust Asset Management, LLC does not receive any soft dollar benefits or client referrals from their custodians.

Review of Accounts

Form ADV Part 2A, Item 13

The securities in every client's account will be under continuous review. Also, all accounts will be formally reviewed quarterly by at least one partner of Global Trust Asset Management, LLC. The review process contains each of the following elements: A. assess client's goals and objectives; B. evaluate the strategy which has been employed; and C. monitor the portfolio.

Account reviews may be triggered by any one or more of the following events: A. significant changes in client's personal circumstances; B. changes in the general economy and/or tax law; C. quarterly; and D. changes in policy limits.

All clients will receive a semi-annual report outlining their current positions, security cost basis, and current market values. Clients also receive performance analysis reports which display the time rated returns realized in the clients' account. The types of reporting may vary based on the clients' circumstances.

All such reports will be in addition to monthly statements received by the client from the client's custodian. All clients in need of a more frequent report may request that additional service.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

Global Trust Asset Management, LLC does not compensate any person for client referrals.

Custody

Form ADV Part 2A, Item 15

All clients of Global Trust Asset Management, LLC will receive a monthly account statement directly from their custodian. They should review those statements as received. If they have any questions on their statement, they can contact Global Trust Asset Management, LLC.

Investment Discretion

Form ADV Part 2A, Item 16

Global Trust Asset Management, LLC only accepts client assets on a discretionary basis. However, this authority is limited to the investment ranges discussed in each client's individualized Investment Policy Statement. Global Trust Asset Management, LLC will not place any discretionary trades on a client's account until they have agreed to an Investment Policy Statement with the client.

Voting Client Securities

Form ADV Part 2A, Item 17

It is Global Trust Asset Management, LLC's general policy not to vote proxies relating to client securities. Generally, a client will receive proxies directly from their custodian. A client will specify in writing if it would or would not like Global Trust Asset Management, LLC to vote all proxies on their behalf. Such writing shall include a client's election to retain their own proxy voting powers by not granting Global Trust Asset Management, LLC the right to vote on the client's behalf, as evidenced by the client's custodial account application(s), where such authority is granted or withheld by the client to Global Trust Asset Management, LLC. Global Trust Asset Management, LLC will not vote proxies for clients whose advisory contract has been terminated or the value of their portfolio is indeterminable or insignificant, or if the client's securities were not purchased by Global Trust Asset Management, LLC. Proxies are voted in the best interests of the clients as determined by the effect, if any, the proposal could have on the current or future value of the investment. Proxies will generally be voted by the Proxy Coordinator, CCO, along with management guidelines as indicated on the proxy to ensure that proxies will be voted in the best interest of the clients and will avoid material conflicts between us and the clients. The Proxy Coordinator will review each proxy proposal for conflicts of interest as part of the overall vote review process. Global Trust Asset Management, LLC will generally vote using our pre-determined voting policy. A copy of our Proxy Voting Policies and voting records are available to clients upon request.

Financial Information

Form ADV Part 2A, Item 18

Global Trust Asset Management, LLC does not require any prepayments of fees from clients.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

EDUCATION AND BUSINESS BACKGROUND

Name: **Brian Joseph Brescia**, CPA, PFS, CFP®, Series 65

Born: 1978

Education Background:

University of Florida - Bachelors of Science – Accounting 2002
Masters of Accounting – Tax 2002

Business Background:

2007 – Present Global Trust Asset Management, LLC
Partner, CCO, Managing Member
2004 – Present Nowlen, Holt, & Miner, P.A.
Partner – CPA
2002 – 2004 PricewaterhouseCoopers, LLP
Personal Financial Services – CPA

Name: **Edward Thomas Holt, Jr.**, CPA, PFS, Series 65

Born: 1979

Education Background:

Clemson University - Bachelors of Science – Accounting 2002
Masters of Professional Accountancy – Tax 2003

Business Background:

2007 – Present Global Trust Asset Management, LLC
Partner, Managing Member
2003 – Present Nowlen, Holt, & Miner, P.A.
Partner – CPA