



GlobalClear Investment and Depository

A GlobalClear Member Company

This program brochure provides information about the qualifications and business practices of GlobalClear Investment and Depository, LLC.

If you have any questions about the contents of this brochure, please contact us at 904-534-2169 and/or www.gid.globalclear.us

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.

GlobalClear Investment and Depository is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about GlobalClear Investment and Depository is also available on the SEC's website at www.adviserinfo.sec.gov.

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Advisory Business

GlobalClear Investment and Depository ('GI&D') offers advisory services. Our services are designed to help you meet your investment goals and objectives. Descriptions of services and fees we offer can be found in this document.

Firm Description

GI&D is owned by a voting trust and has been incorporated since 2014. We acquired an entity with an investment adviser that was state registered in Florida (Treasure Coast Advisors) in 2009 and subsequently became SEC registered in the same year. We changed the name to Premier Financial Management upon purchasing the firm, and in September of 2014 changed the name to GlobalClear Investment & Depository, LLC a State of Georgia entity. We are an investment adviser registered with the SEC and a member of the Financial Industry Regulatory Authority, known as FINRA.

Financial Planning Services Offered

We **DO NOT** provide financial planning services. Financial planning is an investment advisory service that creates a fiduciary relationship. This means that we must place your interests above our own. This brochure explains your rights and obligations in providing you with a financial plan. Please read it carefully and keep it for your records. Please note that although we act as your investment adviser in providing a plan to you, this does not affect any other relationship you may have with a Financial Advisor or GI&D. The nature of your existing GI&D accounts, your rights and obligations relating to these accounts, and the terms and conditions of any GI&D account agreement in effect does not change in any way. You will be charged any applicable fees for effecting transactions you choose to make, including commissions, a portion of which may be passed to a Financial Advisor.

WE DO NOT PROVIDE FINANCIAL PLANNING SERVICES. If you would like GI&D to be involved with helping you develop investment and/or insurance strategies, we would welcome the opportunity to assist you through our investment advisory services. Please note that the capacity in which we act when implementing these strategies will depend on, and vary by the nature of your accounts, as will the governing regulatory agency. Any information presented regarding potential tax considerations is not intended as tax advice and should not be relied upon for the purpose of avoiding any tax penalties. Neither GI&D nor any of its employees provide tax or legal advice and our financial services are not intended to provide, and should not be construed as providing such advice. You should consult with your legal or tax advisors regarding your specific circumstances.

Inclusion of Outside Assets in your Financial Advice

When we provide financial advice for you, you may choose to disclose assets held at other institutions. Because these assets are not held at GI&D, we will not be able to verify or ensure the accuracy of information regarding these assets. GI&D does not provide advice with respect to your assets at other firms, and we will not assume any liability for your activity at other firms.

Electronic Delivery

To the extent permissible by law, we may, with your consent, deliver financial advice, Form ADV disclosure brochures, and other documents and notices related to our services via electronic format.

Services Tailored to Client Needs

We tailor our services to our private member clients. Our vast network of affiliates/members have global experience and expectations. We strive to meet every client's unique needs and situation.

Assets under Management

Our assets under management in wrap fee programs as of October 2014 are \$0.00.

Assets under Management as of October 2014:

- Non-discretionary Programs: \$100,000,000.00
- Discretionary Programs: \$0.00

Fees and Compensation

GI&D receives a fee usually based on a percentage of the market value of assets under management. In certain circumstances described further below, GI&D may also receive other compensation, such as “wrap” fees. GI&D’s standard fee schedule for investment advisory services is indicated below, and GI&D may modify the fees when circumstances warrant (e.g., size of account; size of relationship; accounts that require special services; competitive bids through formal requests for proposals). GI&D generally bills its fees on a quarterly basis and in advance of each calendar quarter. Clients may elect to be billed for fees or to authorize GI&D to directly debit fees from their accounts. Management fees are not prorated for any capital contribution or withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. Lower fees for comparable services may be available from other sources. GI&D’s standard fee schedule represents tiered fees and not weighted averages for total amount of assets under management. There are no start-up or closing fees, and partial periods are prorated over the billing cycle. Advisory agreements may be terminated in accordance with the termination notices and terms of the advisory contract.

The following is GI&D’s standard annual fee schedule:

EQUITY AND BALANCED ACCOUNTS

Account Assets Annual Fees

First \$2,000,000 1.20%

Next \$3,000,000 0.80%

Over \$5,000,000 0.50%

FIXED INCOME ONLY ACCOUNTS

Account Assets Annual Fees

First \$5,000,000 0.50%

Next \$5,000,000 0.35%

Next \$5,000,000 0.30%

Over \$15,000,000 0.25%

GI&D, may or may not, participate in “wrap fee” programs and if it does it would be compensated for its investment advisory services by the financial services entities that sponsor the program (“Sponsor”). Clients that participate in these programs will not be subject to GI&D’s minimum account size requirement that otherwise would apply to separately managed accounts, but may be subject to other independent account requirements established by the Sponsor. The Sponsor may recommend retention of GI&D as an investment advisor, pay the firm’s advisory fee on behalf of the client, monitor and evaluate the firm’s performance, execute the client’s portfolio transactions without commission charge, provide custodial services for the wrap client’s assets, or provide a combination of these and other services all for a single fee paid by the client to the Sponsor. The wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately and if GI&D were free to negotiate commissions and seek best price and execution of transactions for the client’s account. GI&D’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses incurred in connection with managing the client’s account. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by other managers (including sub-advisors when applicable), custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund’s prospectus. Such charges, fees and commissions are exclusive of and in addition to GI&D’s fee, and GI&D will not receive any portion of these commissions, fees, and costs

Performance-Based Fees and Side-By-Side Management

We do not use a performance based-fee structure in our advisory products (fees based on a share of capital gains, or capital appreciation of, the assets of a client).

Types of Clients

We are established to advise a wide range of clients, including individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, co-operatives, credit unions, banking institutions, governments and other businesses.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

The proprietary allocation models from GI&D are updated on a periodic basis.

In developing these proprietary allocation models, the following is considered:

- Historical market performance and the relationship of different types of assets invested in combination with each other.
- Financial objectives and risk characteristics that can impact the structure of a portfolio. This includes a complete discussion and verbal disclosure for a client's perspectives on risk and tax considerations.
- Current market and economic trends that could affect the outcome of a strategic asset allocation mix.

Investment Strategy

Investment strategy is based on the objectives discussed and may be different for each of your accounts. Investment strategies may include asset allocation, long-term purchases, short-term purchases, trading and other discussed with you.

Investing in Securities Involves Risk

Please be aware that all securities carry some level of risk. You may lose money as the value of the securities fluctuates. You should be prepared to bear the risk for each type of security in which you invest, including the possibility of losing some or all of your invested money. Thinking about long-term investment strategies and tolerance for risk can help determine what type of investment is best suited for you.

Disciplinary Information

Since our purchase of Treasure Coast Advisors in 2009, we have had (1) one Disciplinary Action against our firm as noted on our ADV from the Florida Office of Financial Regulation. The matter involved failure to maintain books and records, failure to file timely audited financial statements and failure to maintain net cap and failure to maintain custody with a qualified custodian. The matter was resolved with an Order to Cease and Desist and permanently barred from submitting an application for license in the state of Florida. Our firm should not have been registered in the State of Florida. Our firm does no business with the public and is registered with the SEC, not any state authorities. We conceded the failure to maintain books and records at the Florida Address and vehemently deny the other allegations. We accepted the State of Florida Office of Financial Regulations Final Order without contest.

Other Financial Industry Activities and Affiliations

We are an affiliate GlobalClear Investment Bank. In addition to providing financial advice to clients, some Financial Advisors may offer insurance and investment products through our affiliates. Financial Advisors may also be licensed insurance agents of our insurance agency affiliates throughout the GlobalClear network of entities.

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

Code of Ethics Description

Employees are subject to the GI&D Investment Adviser Code of Ethics (the "Code"). We understand that our business is built on trust – trust between you and us, our suppliers, our business partners and one another. The Code covers a wide range of business practices and procedures for carrying out each employee's responsibilities on our behalf and observing the highest standards of ethical conduct. Our employees must conduct themselves according to these standards and must seek to avoid even the appearance of improper behavior. Our employees are responsible for reviewing the Code annually and for acting in compliance with the Code. In addition to the Code, all of our employees also agree to abide by the GI&D Code of Ethics and Business Conduct. It represents building values of our organization and helps instill ethically sound behavior and accountability among our employees. Every employee certifies compliance with our standards annually. We will provide copies of both upon request.

Personal Trading

Our Code of Ethics prohibits use of material non-public information and regulates personal securities trading by all employees. From time to time, Financial Advisors and other employees of ours may purchase securities for their personal accounts that are available to our clients. These Financial Advisors will not compete with clients in connection with such transactions.

Our Financial Advisors' personal trading accounts are monitored so that you are treated fairly, and the securities purchased for you are done so prior to a Financial Advisor personal transaction.

Brokerage Practices

Our services do not include the review or recommendation of broker dealers for client transactions.

Review of Accounts

We do not provide financial planning services and therefore are not considered to be giving on-going advice. We do not review your financial situation or any other matter on an ongoing basis.

Client Referrals and Other Compensation

Client Referrals

We or our Financial Advisors may receive compensation for referrals made to our affiliates.

Other Compensation

From time to time, we may offer an incentive program to our Financial Advisors to encourage an increase in assets under management or sales. These programs may include sales awards such as trips or other prizes. In addition, some Financial Advisors may be eligible for other compensation upon joining our firm. This could include an upfront cash advance subject to a repayment agreement, one or more backend bonuses, or both.

Custody

If you elect to open an account with GI&D to implement all or a portion of your financial needs the assets in the accounts are typically held by GI&D as a custodian. We provide periodic account statements which you should thoroughly review.

Investment Discretion

Our services may or may not include the management of client assets on a discretionary or non-discretionary basis.

Voting Client Securities

Our Services do not include proxy voting services.

Financial Information

We have no financial condition that is likely to impair our ability to meet contractual commitments to clients.

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