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**FORM ADV PART 2A
BROCHURE**

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Global Opportunistic Investment LLC ("GOI" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at **917-497-4191**.

GOI is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about GOI to assist you in determining whether to retain the Advisor.

Additional information about GOI is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for GOI is 319494.

ITEM 2: SUMMARY OF MATERIAL CHANGES

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of GOI. For convenience, the Advisor has combined these documents into a single disclosure document.

GOI believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. GOI encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

GOI is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

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ITEM 4: ADVISORY BUSINESS

DESCRIPTION OF FIRM

Global Opportunistic Investment LLC ("GOI", "we" or "us") is a registered investment adviser with the Securities and Exchange Commission ("SEC"). GOI is organized as a limited liability company ("LLC") under the laws of the State of Florida. GOI is owned and operated by Rakesh Khilnani (Founder and Chief Investment Officer). Mr. Khilnani has been a Financial Advisor since 1992 and a Portfolio Manager since 1999. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by GOI.

ASSETS UNDER MANAGEMENT

GOI is a newly established advisor. Assets under management shall be reported with the Advisor's next filing of this Disclosure Brochure. Clients may request more current information at any time by contacting the Advisor.

PORTFOLIO MANAGEMENT SERVICES

GOI offers investment advisory services to businesses, high net-worth individuals / families and their related trusts, foundations, partnerships, and retirement accounts, (each referred to as a "Client").

Each account is managed individually and reflects our deep understanding of your stated investment objectives. GOI creates a strategy around your wealth, investment objectives and risk tolerance, which constantly evolves as family, business and economic circumstances change. GOI works on behalf of you, managing your liquid assets in public equities and ETF's, fixed income securities, cash equivalents, private equity funds, options, and hedge funds, when appropriate. When appropriate opportunities arise, GOI will trade in international markets and when protection is deemed necessary, in declining markets, GOI may take reverse market exposure. GOI uses a combination of quantitative fundamental and technical analysis to select and manage investment holdings. Client portfolios generally have exposure to both domestic and international markets.

GOI works with you to develop an investment strategy and an asset allocation appropriately aligned with your individual investment objectives and constraints.

A Portfolio Manager and/or Relationship Manager manages your relationship. Their role is to oversee your investment portfolios, make specific recommendations about how your assets are invested, be cognizant of your risk profile based on your investment objectives, financial profile and risk tolerance, and understand the specific and unique needs of your family or business. When appropriate, GOI will create a comprehensive financial plan tailored to your needs. Such plan will consider income, debt, expenditures, insurance policies, retirement assets, trusts, savings and any other pertinent data, to give you a holistic picture of your financial profile. Our financial plan considers your current lifestyle, future allocations and can include "what-if" scenarios. The plan is monitored and reviewed with you on a periodic basis to help guide and keep your goals within target. You may impose certain restrictions on investing in certain securities or types of securities.

In addition, GOI can coordinate tax and estate planning with your other professionals to identify and implement unique and customized strategies. Similarly, when a capital raise or lending need arises for you, GOI collaborates with you to find a suitable investment bank or lender.

GOI's investment strategies are primarily long-term focused, but GOI may buy, sell or re-allocate positions that have been

held less than one year to meet your objectives or due to market conditions. GOI will construct, implement and monitor the portfolio to ensure it meets your agreed upon goals, objectives, circumstances, and risk tolerance. You will have the opportunity to place reasonable restrictions on the types of investments to be held in your respective portfolio, subject to acceptance by GOI. GOI evaluates and selects investments for inclusion in your portfolios only after applying its internal due diligence process. GOI may recommend, on occasion, redistributing investment allocations to diversify the portfolio. GOI may recommend specific positions to increase sector or asset class weightings. GOI may recommend employing cash positions as a possible hedge against market movement. GOI may also 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 your risk tolerance, generating cash to meet your needs, or any risk deemed unacceptable for your risk tolerance.

Our Strategies

GOI Established Growth

The Established Growth Portfolio is a global equity strategy of 20 large cap securities, representing our highest conviction large cap growth ideas at a reasonable price. Companies in the portfolio are expected to deliver good price appreciation and the portfolio is tilted towards companies selected from the strongest performing sectors. The selection process is quantitative and incorporates both technical and fundamental screens to minimize behavioral biases and capture positive market trends. Securities are monitored daily and are removed from the portfolio upon deterioration of technical indicators. Appreciating positions continue to be held and are scaled back to meet model allocations annually. The portfolio remains mostly fully invested through both up and down-market cycles. In extreme market conditions when we are unable to find 20 securities that meet our criteria, we will temporarily hold cash until market conditions improve. Clients should be capable of absorbing the volatility associated with the S&P 500 Growth Index and have at least a 3 to 5-year time horizon

GOI Established Value

The Established Value Portfolio is a global equity strategy of 20 large cap securities, representing our highest conviction large cap value ideas. The portfolio is comprised of dividend paying securities that are priced reasonably to cash flow, book value and sales levels. The selection process applies fundamental screens with a focus on the quality of the business, consensus analysts targets and the prevailing stock prices. This strategy prioritizes stable businesses including household names. Securities are monitored daily and are removed from the portfolio upon reaching price targets or erosion of cash flow, book value, or sales metrics. The portfolio is rebalanced annually. The portfolio remains mostly fully invested through both up and down-market cycles. In extreme market conditions when we are unable to find 20 securities that meet our criteria, we will temporarily hold cash until market conditions improve. Clients should be capable of absorbing the volatility associated with the S&P 500 Value Index and have at least a 3 to 5-year time horizon.

GOI Disruptors+

The Disruptors+ Portfolio is a global equity strategy of 20 disruptive or special situation companies, representing our highest conviction Rapid Growth ideas. The rapid expected growth may be due to the company's disruptive technologies or expected recovery from negative situations. Companies in the portfolio are expected to deliver very high sales and earnings growth in the future but may not presently have positive earnings per share. The selection process is quantitative and incorporates both technical and fundamental screens to minimize behavioral biases and capture positive market trends. Although holdings are predominantly midcap companies, they may include large cap and small cap companies as well. Securities are removed from the portfolio upon deterioration of technical indicators to potentially limit significant downside. Appreciating positions continue to be held and are scaled back to meet model allocations annually. The

portfolio remains mostly fully invested through both up and down-market cycles. In extreme market conditions when we are unable to find 20 securities that meet our criteria, we will temporarily hold cash until market conditions improve. As a concentrated portfolio of relatively new and/or highly volatile companies, clients should consider Disruptors+ as part of an otherwise diversified portfolio. Further, clients should be willing to ride out substantial volatility associated with the Russell Midcap Growth Index and have at least a 5-year time horizon

GOI Blend 20

The Blend 20 Portfolio is a global equity strategy of 20 companies, representing a combined, yet abridged, approach of Growth at a Reasonable Price, Value, and Disruptive / Special Situation companies. The securities in this portfolio are selected from the Established Growth, Established Value and Disruptors+ strategies with about 10 of the securities coming from Established Growth, about 6 from Established Value and about 4 from Disruptors+. Please review each of these individual strategies for details on the specific selection processes. The positions in Blend 20 are monitored daily, and positions will be sold when they are removed from the underlying strategies from which the stocks were chosen. The portfolio is rebalanced annually. Clients should be capable of absorbing the volatility associated with the S&P 500 Index and have at least a 3 to 5-year time horizon.

GOI Blend 60

The Blend 60 Portfolio is a global equity strategy of 60 companies, representing a combined approach of Growth at a Reasonable Price, Value, and Disruptive / Special Situation companies. The securities in this portfolio consists of 50% Established Growth, 30% Established Value and 20% Disruptors+ strategies in their entirety. Please review each of these individual strategies for details on the specific selection processes. The positions are monitored daily, and positions will be sold when they are removed from the underlying strategies from which the stocks were chosen. In extreme market conditions when we are unable to find 60 securities that meet our criteria, we will temporarily hold cash until market conditions improve. The portfolio is rebalanced annually. Clients should be capable of absorbing the volatility associated with the S&P 500 Index and have at least a 3 to 5-year time horizon.

GOI Six Pack

The Six Pack Portfolio is a highly concentrated strategy of 6 companies, representing a combined approach of Growth at a Reasonable Price, Value, and Disruption / Special Situations. 3 securities are selected from Established Growth, 2 from Established Value, and 1 from Disruptors+. Please review each of these individual strategies for details on the specific selection processes. The intention for Six Pack is to be a low turnover, tax efficient strategy by favoring long term gains. Positions are held for at least a year and are rebalanced annually. Longer hold periods from 1 year to 3 years can be selected. Clients should be capable of absorbing 120% of the volatility associated with the S&P 500 Index and have at least a 3 to 5-year time horizon.

GOI Focus

The Focus Portfolio is a global, multi asset class strategy of 15 securities, representing our highest conviction ideas from all of our strategies. The selection process is quantitative and incorporates both technical and fundamental screens to minimize behavioral biases and capture positive market trends. Securities held in the portfolio have, what we believe to be, the strongest technical and fundamental indicators. Holdings may include large cap, mid cap, small cap, international, and alternative securities. Securities are removed from the portfolio upon deterioration of technical indicators to potentially limit significant downside. Appreciating positions continue to be held and are scaled back to meet model allocations annually. The portfolio remains mostly fully invested through both up and down-market cycles. As a more concentrated portfolio, the potential for increased volatility exists, with the expectation of a higher return over time.

Clients should be capable of absorbing 120% of the volatility associated with the S&P 500 Index and have at least a 3 to 5-year time horizon.

GOI Dynamic ETF

The Dynamic ETF Portfolio is a global equity strategy of up to 8 ETF/ETNs with the intention of staying dynamically yet fully invested through market volatility in the strongest sectors and / or themes. The Dynamic ETF portfolio is intended for clients that wish to participate in general trends in the market without the ownership of individual stocks. The strongest sectors and / or themes are determined using our technical trading systems. The universe of ETF/ETNs are reviewed regularly, and the portfolio is adjusted accordingly. Holdings may include sector, thematic, international, or alternative ETF/ETNs. ETF/ETNs within the portfolio are monitored daily and will be allowed to appreciate until the technical sell signal is triggered. Clients should be capable of absorbing the volatility associated with the S&P 500 Index and have at least a 3 to 5-year time horizon.

GOI Fixed Income

The Fixed Income Portfolio consists of 10 Bond ETFs that typically have fixed maturities. The ETFs are laddered over 10 years. High-Yield Bond exposure is used for earlier maturity years and Investment Grade Corporates, Munies, or Treasuries are used for later maturity years. In addition, the portfolio may include currency hedged and interest-rate hedged Bond ETFs. As the investments are laddered, a portion of the portfolio is expected to mature each year, providing the ability to take distributions or reinvest. This portfolio is intended for investors that seek fixed income or have a desire to reduce their overall portfolio risk by coupling it with their equity portfolios. Investors should be capable of absorbing the volatility associated with the Barclays US Aggregate Bond Index.

GOI CAPE

The CAPE Portfolio consists of 5 to 10 ETF/ETNs in the Commodities, Alternatives, and Precious Metals space. The objective is to gain diversification against an otherwise balanced portfolio of Stocks and Bonds. This strategy may serve as a hedge against a standard stock / bond portfolio, a weakening dollar and inflation. The ETFs are selected using our technical trading system and will be allowed to appreciate until the technical sell signal is triggered. If none of the investments in the CAPE portfolio's universe are on a buy-signal, we may stay in cash until the investment climate improves. The positions are monitored daily and are subject to an annual rebalance. Clients should already have diversified portfolios, be capable of absorbing 1.5 times the volatility associated with the Wilshire Liquid Alternatives Index and have at least a 3 to 5-year investment time horizon.

GOI Equity Income

The Equity Income Portfolio consists of 15 high dividend paying securities with a portfolio target yield of approximately 5%. These securities may include REITs, MLPs, or high dividend common stocks. The holdings must meet our quantitative and technical selection criteria before being added into the portfolio. The Equity Income portfolio may tactically hold up to 30% cash when high dividend-yielding securities meeting our criteria cannot be found. If underperformance of high yield equity is anticipated, we may hold short term high yield bonds in the interim. Securities are removed from the portfolio upon deterioration of technical indicators, to potentially limit losses. Appreciating positions continue to be held in the portfolio and are scaled back to model allocations annually. It should be noted that MLPs generate K1s. The Equity Income Portfolio has low correlation to standard equity portfolios and thus can be utilized to potentially reduce the overall long-term volatility of an otherwise balanced portfolio. Clients should be capable of absorbing the volatility associated with the Wilshire US REIT Index and the Alerian MLP index.

ITEM 5 FEES AND COMPENSATION

GOI FEES

GOI investment advisory fees are paid quarterly, in advance, at the rate schedule below, based on the appraised value of actively managed assets.

GOI Advisory Fee Schedule- Asset Management

AG - Aggressive Growth
MG - Moderate Growth
CG - Conservative Growth

AG&I - Aggressive Growth & Income
MG&I - Moderate Growth & Income
CG&I - Conservative Growth & Income

AI - Aggressive Income
MI - Moderate Income
CI - Conservative Income

Investment Objective / Risk Target

Household Value	AG/90	MG/80	CG/70	AG&I/60	MG&I/50	CG&I/40	AI/30	MI/20	CI/10
First \$500,000	2.00%	1.80%	1.70%	1.60%	1.50%	1.40%	1.30%	1.20%	1.00%
Next \$500,000	1.50%	1.35%	1.28%	1.20%	1.13%	1.05%	0.98%	0.90%	0.75%
Next \$4 million	1.00%	0.90%	0.85%	0.80%	0.75%	0.70%	0.65%	0.60%	0.50%
Over \$5 million	0.50%	0.45%	0.43%	0.40%	0.38%	0.35%	0.33%	0.30%	0.25%

*** Fees do not include custodian, trading costs, and technology fees. Fees do not include third-party money manager or other platform fees.**

A customized blend of GOI strategies can be created to satisfy the investment objectives above. GOI's annual portfolio management fee is billed and payable, quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter, as specified in your written agreement with GOI (the "GOI IAA"). If the GOI IAA is executed at any time other than the first day of a calendar quarter, GOI's fees will apply on a pro rata basis, which means that the GOI Fee is payable in proportion to the number of days in the quarter for which you are a client. Such adjustments are reflected in the fee calculations for the next quarterly period. In the event the GOI IAA is terminated, the fee for the final billing period is prorated through the effective date of the termination and the unearned portion is refunded to the client, as appropriate. No increase in the annual fee percentage shall be effective without 30 days' prior written notification to you.

ADDITIONAL FEES AND EXPENSES

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. Certain mutual funds may charge a redemption fee if you were to sell shares of the fund before a period of time outlined in the fund's prospectus. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, us, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

We may trade client accounts on margin. You must sign a separate margin agreement before margin is extended to your account. Fees for advice and execution on these securities are based on the total asset value of the account, which includes the value of the securities purchased on margin. While a negative amount may show on your statement for the margined security as the result of a lower net market value, the amount of the fee is based on the absolute market value.

This can create a conflict of interest where we have an incentive to encourage the use of margin to create a higher market value and therefore receive a higher fee. The use of margin may also result in interest charges in addition to all other fees and expenses associated with the security involved.

IRA ROLLOVER CONSIDERATIONS

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your retirement plan or your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the IAA. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by us.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been

generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.

7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. 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. Our fees are calculated as described in the *Fees and Compensation* section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

ITEM 7: TYPES OF CLIENTS

We offer investment advisory services to individuals, high net worth individuals, accredited and qualified investors, charitable organizations, foundations, and corporations or other businesses entities.

GOI typically requires a minimum household size of \$1,000,000 for advisory accounts. GOI reserves the right to lower account minimums in certain instances.

We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Charting Analysis - involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data are used to detect departures from expected performance and diversification and predict future price movements and trends.

Risk: Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Technical Analysis - involves studying past price patterns, trends and interrelationships in the financial markets and predict the direction of both the overall market and specific securities.

Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends.

Risk: The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Modern Portfolio Theory - a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk or minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets.

Risk: Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus may not be eliminated by diversification.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

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.

Risk: Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Short Sales - Unlike a straightforward investment in stocks where you buy shares with the expectation that their price will increase so you can sell at a profit, in a "short sale" you borrow stocks from your brokerage firm and sell them immediately, hoping to buy them later at a lower price. Thus, a short seller hopes that the price of a stock will go down in the near future. A short seller thus uses declines in the market to his advantage. The short seller makes money when the stock prices fall and loses when prices go up. The SEC has strict regulations in place regarding short selling.

Risk: Short selling is very risky. Investors should exercise caution before short selling is implemented. A short seller will profit if the stock goes down in price, but if the price of the shares increase, the potential losses are unlimited because the stock can keep rising forever. There is no ceiling on how much a short seller can lose in a trade. The share price may keep going up and the short seller will have to pay whatever the prevailing stock price is to buy back the shares. However, gains have a ceiling because the stock price cannot fall below zero.

Risks: A short seller has to undertake to pay the margin interest on the borrowed securities as long as the short seller chooses to keep the short position open. If the company declares dividends the short seller will have to pay that amount to the lender. The broker can use the funds in the short seller's margin account to buy back the loaned shares or issue a "call away" to get the short seller to return the borrowed securities. If the broker makes this call when the stock price is much higher than the price at the time of the short sale, then the investor can end up taking huge losses.

Risk: Margin interest can be a significant expense. Since short sales can only be undertaken in margin accounts, the interest payable on short trades can be substantial, especially if short positions are kept open over an extended period.

Risk: Shares that are difficult to borrow – because of high short interest, limited float, or any other reason – have "hard-to-borrow" fees. These fees are based on an annualized rate that can range from a small fraction of a percent to more than 100% of the value of the short trade. The hard-to-borrow rate can fluctuate substantially on a daily basis; therefore, the exact dollar amount of the fee may not be known in advance and may be substantial.

Margin Transactions - a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Risk: If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them.

Option Writing

Options are complex securities that involve risks and are not suitable for everyone. Option trading can be speculative in nature and carry substantial risk of loss. It is generally recommended that you only invest in options with risk capital. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an underlying asset at a specific price on or before a certain date (the "expiration date"). The two types of options are calls and puts:

- A call gives the holder the right to buy an asset at a certain price within a specific period of time. Calls are similar to having a long position on a stock. Buyers of calls hope that the stock will increase substantially before the option expires.
- A put gives the holder the right to sell an asset at a certain price within a specific period of time. Puts are very similar to having a short position on a stock. Buyers of puts hope that the price of the stock will fall before the option expires

Selling options is more complicated and can be even riskier. The option trading risks pertaining to options buyers are:

- Risk of losing your entire investment in a relatively short period of time.
- The risk of losing your entire investment increases if, as expiration nears, the stock is below the strike price of the call (for a call option) or if the stock is higher than the strike price of the put (for a put option).
- European style options which do not have secondary markets on which to sell the options prior to expiration can only realize its value upon expiration.
- Specific exercise provisions of a specific option contract may create risks.
- Regulatory agencies may impose exercise restrictions, which stops you from realizing value.

The option trading risks pertaining to options sellers are:

- Options sold may be exercised at any time before expiration.
- Covered Call traders forgo the right to profit when the underlying stock rises above the strike price of the call options sold and continues to risk a loss due to a decline in the underlying stock.
- Writers of Naked Calls risk unlimited losses if the underlying stock rises.
- Writers of Naked Puts risk unlimited losses if the underlying stock drops.
- Writers of naked positions run margin risks if the position goes into significant losses. Such risks may include liquidation by the broker.
- Writers of call options can lose more money than a short seller of that stock on the same rise on that underlying stock. This is an example of how the leverage in options can work against the option trader.
- Writers of Naked Calls are obligated to deliver shares of the underlying stock if those call options are exercised.
- Call options can be exercised outside of market hours such that effective remedy actions cannot be performed by the writer of those options.
- Writers of stock options are obligated under the options that they sold even if a trading market is not available or that they are unable to perform a closing transaction.
- The value of the underlying stock may surge or ditch unexpectedly, leading to automatic exercises.

Other option trading risks are:

- The complexity of some option strategies is a significant risk on its own.
 - Option trading exchanges or markets and option contracts themselves are open to changes at all times.
 - Options markets have the right to halt the trading of any options, thus preventing investors from realizing value.
 - Risk of erroneous reporting of exercise value.
 - If an options brokerage firm goes insolvent, investors trading through that firm may be affected
- Internationally traded options have special risks due to timing across borders.

Options are complex investments and can be very risky if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited. You should read the option disclosure document, "Characteristics and Risks of Standardized Options," which can be obtained from any exchange on which options are traded, by calling 1-888-OPTIONS, or by contacting us directly.

Trading - We may use frequent trading (in general, selling securities within 30 days of purchasing the same securities) as an investment strategy when managing your account(s). We may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk. This may include buying and selling securities frequently in an effort to capture significant market gains and avoid significant losses.

Risk: When a frequent trading policy is in effect, there is a risk that investment performance within your account may be negatively affected, particularly through increased brokerage and other transactional costs and taxes.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

We will not perform quantitative or qualitative analysis of individual securities when we allocate your assets among various classes of securities or third-party money managers. We may rely on investment model portfolios and strategies developed by the third-party money managers and their portfolio managers. We may replace/recommend replacing a third-party money manager if there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark.

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Moreover, custodians and broker-dealers must report the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to us immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

We recommend various types of securities and we do not primarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

Money Market Funds: A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some, or all, of your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." Because money market funds are considered

to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Certificates of Deposit: Certificates of deposit are generally the safest type of investment since the principal amount is insured by the federal government up to a certain amount.

Municipal Securities: Municipal securities, while generally thought of as safe, can have significant risks associated with them including, but not limited to: the credit worthiness of the governmental entity that issues the bond; the stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same amount of interest or yield to maturity.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Interest rate risk: applies to debt investments such as bonds. It is the risk of losing money because of a change in the interest rate. For example, if the interest rate goes up, the market value of bonds will drop.

Currency risk: applies when you own foreign investments. It is the risk of losing money because of a movement in the exchange rate. For example, if the U.S. dollar becomes less valuable relative to the Canadian dollar, your U.S. stocks will be worth less in Canadian dollars.

Credit risk: The risk that the government entity or company that issued the bond will run into financial difficulties and won't be able to pay the interest or repay the principal at maturity. Credit risk applies to debt investments such as bonds. You can evaluate credit risk by looking at the credit rating of the bond.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). Stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

ETF Risks: The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Commercial Paper: Commercial paper ("CP") is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default. There is a less risk in asset based commercial paper (ABCP). The difference between ABCP and CP is that instead of being an unsecured promissory note representing an obligation of the issuing company, ABCP is backed by securities. Therefore, the perceived quality of the ABCP depends on the underlying securities.

Variable Annuities: A variable annuity is a form of insurance where the seller or issuer (typically an insurance company)

makes a series of future payments to a buyer (annuitant) in exchange for the immediate payment of a lump sum (single-payment annuity) or a series of regular payments (regular-payment annuity). The payment stream from the issuer to the annuitant has an unknown duration based principally upon the date of death of the annuitant. At this point, the contract will terminate, and the remainder of the funds accumulated forfeited unless there are other annuitants or beneficiaries in the contract. Annuities can be purchased to provide an income during retirement. Unlike fixed annuities that make payments in fixed amounts or in amounts that increase by a fixed percentage, variable annuities, pay amounts that vary according to the performance of a specified set of investments, typically bond and equity mutual funds. Many variable annuities typically impose asset-based sales charges or surrender charges for withdrawals within a specified period. Variable annuities may impose a variety of fees and expenses, in addition to sales and surrender charges, such as mortality and expense risk charges; administrative fees; underlying fund expenses; and charges for special features, all of which can reduce the return. Earnings in a variable annuity do not provide all the tax advantages of 401(k)s and other before-tax retirement plans. Once the investor starts withdrawing money from their variable annuity, earnings are taxed at the ordinary income rate, rather than at the lower capital gains rates applied to other non-tax-deferred vehicles which are held for more than one year. Proceeds of most variable annuities do not receive a "step-up" in cost basis when the owner dies like stocks, bonds and mutual funds do. Some variable annuities offer "bonus credits." These are usually not free. In order to fund them, insurance companies typically impose mortality and expense charges and surrender charge periods. In an exchange of an existing annuity for a new annuity (so-called 1035 exchanges), the new variable annuity may have a smaller death benefit; may impose new surrender charges or increase the period of time for which the surrender charge applies; may have higher annual fees; and provide another commission for the broker.

Real Estate: Real estate is known for its ability to serve as a portfolio diversified and inflation hedge. However, the asset class still bears a considerable amount of market risk. Real estate has shown itself to be very cyclical, somewhat mirroring the ups and downs of the overall economy. In addition to employment and demographic changes, real estate is also influenced by changes in interest rates and the credit markets, which affect the demand and supply of capital and thus real estate values. Property returns are directly affected by local market basics, real estate portfolios that are too heavily concentrated in one area or property type can lose their risk mitigation attributes and bear additional risk by being too influenced by local or sector market changes.

Real Estate Investment Trust: A real estate investment trust ("REIT") is a corporate entity which invests in real estate and/or engages in real estate financing. A REIT reduces or eliminates corporate income taxes. REITs can be publicly or privately held. Public REITs may be listed on public stock exchanges. REITs are required to declare 90% of their taxable income as dividends, but they actually pay dividends out of funds from operations, so cash flow has to be strong or the REIT must either dip into reserves, borrow to pay dividends, or distribute them in stock (which causes dilution). Some REITs must refinance or erase large balloon debts periodically. Fluctuations in the real estate market can affect the REIT's value and dividends.

Limited Partnerships: A limited partnership is a financial affiliation that includes at least one general partner and a number of limited partners. The partnership invests in a venture, such as real estate development or oil exploration, for financial gain. The general partner may not invest any capital but has management authority and unlimited liability. That is, the general partner runs the business and, in the event of bankruptcy, is responsible for all debts not paid or discharged. The limited partners have no management authority and confine their participation to their capital investment. That is, limited partners invest a certain amount of money and have nothing else to do with the business. However, their liability is limited to the amount of the investment. In the worst-case scenario for a limited partner, he/she loses what he/she invested. Profits are divided between general and limited partners according to an arrangement formed at the creation of the partnership.

PIPES: In a Private Investment in Public Equity ("PIPE") transaction, investors typically purchase securities directly from a publicly traded company in a private placement. Depending on the structure of the transaction, this can be done at a

premium to or at a discount from the market price of the company's common stock. Because the sale of the securities is not pre-registered with the U.S. Securities and Exchange Commission ("SEC"), the securities are "restricted" and cannot be immediately resold by the investors into the public markets. Accordingly, the company will usually agree as part of the PIPE transaction to register the restricted securities with the SEC. Thus, the PIPE transaction can offer the company the speed and predictability of a private placement, while providing investors with a nearly liquid security. Risks of investing in PIPES include but may not be limited to substantial entry requirements, limited liquidity, limited investor control, potential for unfunded commitments, and loss of investment.

Derivatives: Derivatives are types of investments where the investor does not own the underlying asset, but he makes a bet on the direction of the price movement of the underlying asset via an agreement with another party. There are many different types of derivative instruments, including options, swaps, futures, and forward contracts. Derivatives have numerous uses as well as various risks associated with them, but they are generally considered an alternative way to participate in the market. Investors frequently use derivatives for three reasons: to hedge a position, to increase leverage, or to speculate on an asset's movement. The key to making a sound investment is to fully understand the risks associated with the derivative, including, but not limited to counterparty, underlying asset, price, and expiration risks. The use of a derivative only makes sense if the investor is fully aware of the risks and understands the impact of the investment within a portfolio strategy. Due to the variety of available derivatives and the range of potential risks, a detailed explanation of derivatives is beyond the scope of this disclosure.

Structured Products: A structured product, also known as a market-linked product, is generally a pre-packaged investment strategy based on derivatives, such as a single security, a basket of securities, options, indices, commodities, debt issuances, and/or foreign currencies, and to a lesser extent, swaps. Structured products are usually issued by investment banks or affiliates thereof. They have a fixed maturity and have two components: a note and a derivative. The derivative component is often an option. The note provides for periodic interest payments to the investor at a predetermined rate, and the derivative component provides for the payment at maturity. Some products use the derivative component as a put option written by the investor that gives the buyer of the put option the right to sell to the investor the security or securities at a predetermined price. Other products use the derivative component to provide for a call option written by the investor that gives the buyer of the call option the right to buy the security or securities from the investor at a predetermined price. A feature of some structured products is a "principal guarantee" function, which offers protection of principal if held to maturity. However, these products are not always Federal Deposit Insurance Corporation insured; they may only be insured by the issuer, and thus have the potential for loss of principal in the case of a liquidity crisis, or other solvency problems with the issuing company. Investing in structured products involves a number of risks including but not limited to: fluctuations in the price, level or yield of underlying instruments, interest rates, currency values and credit quality; substantial loss of principal; limits on participation in any appreciation of the underlying instrument; limited liquidity; credit risk of the issuer; conflicts of interest; and, other events that are difficult to predict.

ITEM 9: DISCIPLINARY INFORMATION

There are no legal, regulatory or disciplinary events involving GOI or its management persons. GOI values the trust Clients place in us. We encourage Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 319494.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

LICENSED INSURANCE AGENTS

Persons associated with us may also be licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. See the *Fees and Compensation* section in this brochure for more information on the compensation received by insurance agents who are affiliated with us.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

DESCRIPTION OF OUR CODE OF ETHICS

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with us, including personal trading, disclosure of outside business activities and insider trading policies. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with us are expected to adhere strictly to these guidelines. Persons associated with us are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with us.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

GOI and its employees may give advice and take action in the performance of their duties that may be the same as, similar to, or different from advice given, or the timing or nature of actions taken, for other Client accounts or for their proprietary or personal accounts. GOI and its employees may at any time hold, acquire, increase, decrease, dispose of or otherwise deal with positions in investments in which your account may have an interest from time to time. We have no obligation to acquire for your account a position in any investment, which it, acting on behalf of another Client, or an employee, may acquire, and the Client accounts shall not have first refusal, co-investment or other rights in respect of any such investment. In addition, our employees may be invested in our products. Because this may present a potential conflict of interest, we have adopted a Code of Ethics, which includes restrictions on employees' personal trading as described above.

PERSONAL TRADING PRACTICES

GOI or its employees buy or sell the same securities that we recommend to you, or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities. Personal trading by our employees is reviewed by our Chief Compliance Officer, or a designee.

ITEM 12: BROKERAGE PRACTICES

Custodial services are provided by Pershing Advisor Solutions ("PAS"), and Charles Schwab, each, a "Qualified Custodian".

The recommended Custodians are securities broker-dealers and members of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. We believe that the recommended broker dealer provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the broker dealer, including the value of the broker's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of the services the broker provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

RESEARCH AND OTHER SOFT DOLLAR BENEFITS

We do not have any soft dollar arrangements.

BROKERAGE FOR CLIENT REFERRALS

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

DIRECTED BROKERAGE

In limited circumstances, and at our discretion, you may instruct us to use one or more particular brokers, other than our primary custodians, for the transactions in your accounts. If you choose to direct us to use a particular broker, you should understand that this might prevent us from aggregating trades with other client accounts or from effectively negotiating brokerage commissions on your behalf. This practice may also prevent us from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

AGGREGATED TRADES

We may combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Generally, participating accounts will pay a fixed transaction cost regardless of the number of shares transacted. In certain cases, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given transaction. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by us or persons associated with us may participate in aggregated trading with your accounts; however, they will not be given preferential treatment as aggregated or "block" orders each receive the same average price.

We generally do not aggregate trades for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with us, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with us.

TRADE ERRORS

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling

the trade, adjusting an allocation, and/or reimbursing the account.

ITEM 13: REVIEW OF ACCOUNTS

Your Investment Professional will monitor your accounts on an ongoing basis and will conduct account reviews at least annually, to ensure the advisory services provided to you are consistent with your investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

We may provide you with additional or regular written reports in conjunction with account reviews. Reports we provide to you will contain relevant account and/or market-related information. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s). You should always compare the reports we provide to you versus those you receive from your custodian for accuracy. You should contact your investment professional promptly if there are material discrepancies between our statements and those from your custodian.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

We receive economic benefits from a non-client for providing investment advice or other advisory services to you. Through our participation in certain programs or use of a custodian we are entitled to receive economic benefits. As part of our fiduciary duty, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of economic benefits by us from a non-client in and of themselves creates a potential conflict of interest and may influence our choice in providing services to your account. This arrangement does not cause you to pay any additional transaction fees beyond those that are traditionally charged by us and/or other service providers.

Refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

Clients and prospective clients should review Item 10 for information about parties the Adviser may refer clients to and additional compensation the Adviser may receive from these parties.

ITEM 15: CUSTODY

As paying agent for GOI, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes us to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a qualified bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. We may also provide account statements to you at least quarterly, in addition to the statements you receive from your custodian. Certain price discrepancies, timing of deposits or withdrawals, or other minor differences between our statements and your custodial statements may occur. You should carefully review both account statements for accuracy.

ITEM 16: INVESTMENT DISCRETION

If you participate in our discretionary portfolio management services, we require you to grant us written discretionary authority to manage your account. When you grant us discretion, we have the authority and responsibility to formulate investment strategies on your behalf. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without obtaining your approval prior to each transaction. We will also have discretion over the broker or dealer to be used for securities transactions, and over the commission rates to be paid. Discretionary authority is typically granted by the IAA you sign with us, a power of attorney, or trading authorization forms. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the *Advisory Business* section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with us, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by us on a non-discretionary basis.

ITEM 17: VOTING CLIENT SECURITIES

GOI has contracted with Institutional Shareholder Services (ISS) to vote proxies for our clients. This service is inclusive of the management fees charged on client accounts. ISS is a global company and is the world's leading provider of corporate governance and responsible investment (RI) solutions for asset owners, asset managers, hedge funds, and asset service providers. You can review the ISS voting policy by going to the below website:

<https://www.issgovernance.com/policy-gateway/2017-policy-information/>

You may also contact us for a copy of our proxy voting policy.

ITEM 18: FINANCIAL INFORMATION

We do not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We have not filed a bankruptcy petition at any time in the past ten years and we do not require the prepayment of more than \$1,200 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

PRIVACY POLICY

YOUR PRIVACY

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We may disclose your non-public personal information to non-affiliated third parties. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an IAA with us. Contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

If you decide to close your account(s) we will adhere to our privacy policies, which may be amended from time to time. If we make any substantive changes in our privacy policy that would further permit or require disclosures of your private information, we will provide written notice to you. Where the change is based on permitted disclosures, you will be given an opportunity to direct us as to whether such disclosure is acceptable. Where the change is based on required disclosures, you will only receive written notice of the change. You may not opt out of the required disclosures.

If you have questions about our privacy policies contact our main office at the telephone number on the cover page of this brochure and ask to speak to the Chief Compliance Officer.