



Global Opportune Investments LLC

Form ADV Part 2A – Disclosure Brochure

Effective: July 2, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Global Opportune Investments LLC (“**goi**” or the “Adviser”). If you have any questions about the content of this Disclosure Brochure, please contact the Adviser at 888-464-4742 or by email at rkhilnani@goi-ria.com.

goi is a registered investment adviser located in the State of Florida. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”)/SEC or by any state securities authority. Registration of an investment adviser 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 Adviser.

Additional information about **goi** and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Adviser’s firm name or CRD# 319494.

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Item 2 – 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 Adviser's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of **goi**.

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 Adviser.

Material Changes

There have been no material changes to this disclosure brochure since the last filing and distribution to clients.

Future Changes

From time to time, the Adviser may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Adviser's firm name or CRD# 319494. You may also request a copy of this Disclosure Brochure at any time by contacting the Adviser at 888-464-4742 or by email at rkhilnani@goi-ria.com.

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Item 4 – Advisory Services

A. Firm Information

Global Opportune Investments LLC (“**goi**” - *pronounced like joy* - or the “Adviser”) is a registered investment adviser located in the State of Florida. The Adviser is organized as a Limited Liability Company (LLC) under the laws of the State of Florida. **goi** was founded in February 2022 and is owned and operated by Rakesh Khilnani (Founder, Chief Investment Officer, and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by **goi**.

B. Advisory Services Offered

goi offers investment advisory services to individuals, high net worth individuals, families, trusts, foundations, partnerships, businesses, and retirement accounts (each referred to as a “Client”).

The Adviser serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Adviser upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. **goi**'s fiduciary commitment is further described in the Adviser's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Service

goi provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. **goi** works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy.

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.

Financial planning and consulting recommendations pose a conflict between the interests of the Adviser and the interests of the Client. For example, the Adviser has an incentive to recommend that Clients engage the Adviser for investment management services or to increase the level of investment assets with the Adviser, as it would increase the amount of advisory fees paid to the Adviser. Clients are not obligated to implement any recommendations made by the Adviser or maintain an ongoing relationship with the Adviser. If the Client elects to act on any of the recommendations made by the Adviser, the Client is under no obligation to implement the transaction through the Adviser.

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 and household names. 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 and/or cash equivalents 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 and/or cash equivalents 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 High Growth ideas. The high 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 and/or

cash equivalents 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 50% of the securities coming from Established Growth, about 30% from Established Value and about 6% 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 approximately 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 and/or cash equivalents 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. approximately 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 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. In extreme market conditions when we are unable to find 15 securities that meet our criteria, we will temporarily hold cash and/or cash equivalents until market conditions improve. 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. In extreme market conditions when we are unable to find 8 ETFs/ETNs that meet our criteria, we will temporarily hold cash and/or cash equivalents until market conditions improve. 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, Munis, or Treasuries/Agencies 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 ETF/ETNs 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 and/or cash equivalents 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 significant amounts of cash and / or cash equivalents when high dividend-yielding securities meeting our criteria cannot be found. If underperformance of high yield equity is anticipated, we may also 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 is expected to have 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.

Pursuant to California Code of Regulations Section 260.238(k), the Adviser, has disclosed all material conflicts of interests that could reasonably be expected to impair the rendering of unbiased and objective advice.

At no time will **goi** accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Retirement Accounts – When the Adviser provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Adviser is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Adviser will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Adviser will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Adviser.

Financial Planning Services

goi will typically provide a variety of financial planning and consulting services to Clients, in association with its Investment Management services. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to, the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence, or alter retirement savings, establish education savings and/or charitable giving programs.

goi may also refer Clients to an accountant, attorney, or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Adviser will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Adviser may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Adviser and the interests of the Client. For example, the Adviser has an incentive to recommend that Clients engage the Adviser for investment management services or to increase the level of investment assets with the Adviser, as it would increase the amount of advisory fees paid to the Adviser. Clients are not obligated to implement any recommendations made by the Adviser or maintain an ongoing relationship with the Adviser. If the Client elects to act on any of the recommendations made by the Adviser, the Client is under no obligation to implement the transaction through the Adviser.

C. Client Account Management

Prior to engaging **goi** to provide investment advisory services, each Client is required to enter into one or more agreements with the Adviser that define the terms, conditions, authority and responsibilities of the Adviser and the Client. These services may include:

- Establishing an Investment Strategy – **goi**, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – **goi** will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- Portfolio Construction – **goi** will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – **goi** will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

goi does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by **goi**.

E. Assets Under Management

As of December 31, 2023, **goi** manages \$66,781,011 in Client assets, \$62,027,825 of which are managed on a discretionary basis and \$4,753,186 on a non-discretionary basis. Clients may request more current information at any time by contacting the Adviser.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Adviser. Each Client engaging the Adviser for services described herein shall be required to enter into one or more written agreements/a written agreement with the Adviser.

A. Fees for Advisory Services

Investment Management Services

goi investment advisory fees are paid quarterly, in advance, at the rate schedule below, based on the appraised value of actively managed assets. In addition, the Adviser will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by **goi** to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

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.

The tiered fee schedule results in a "blended" fee based on the assets under management at the time of the billing calculation. For example, for an account in a conservative income strategy, assets valued at \$1,000,000 based on the above schedule, Clients will be billed 1.00% for the first \$500,000, and 0.75% for the next \$500,000. This results in a blended rate of 0.88% annually.

Pursuant to California Code of Regulations Section 260.238(j), the Adviser discloses that the Client may be able to obtain similar services from other services providers for a lower fee.

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.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Adviser or its delegate and deducted from the Client's account[s] at the Custodian. The Adviser shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the annual

rate (annual rate divided by 4) to the total assets under management with **goi** at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Adviser will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. Clients are urged to also review and compare the statement provided by the Adviser to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by **goi** to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than **goi**, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Adviser's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by **goi** are separate and distinct from these custody and execution fees.

In addition, all fees paid to **goi** for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of **goi**, but would not receive the services provided by **goi** which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by **goi** to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

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.

D. Advance Payment of Fees and Termination

Investment Management Services

goi may be compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Adviser's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Adviser will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Adviser is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

goi does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice

presents a conflict of interest because persons providing investment advice on behalf of the Adviser who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Adviser. Please see item 10 – Other Financial Industry Activities and Affiliations.

Item 6 – Performance-Based Fees and Side-By-Side Management

goi does not charge performance-based fees for its investment advisory services. The fees charged by **goi** are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

goi does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

goi offers investment advisory services to individuals, high net worth individuals, families, trusts, foundations, partnerships, businesses, and retirement accounts. **goi** generally requires a minimum relationship size of \$1,000,000 to effectively implement its investment process. **goi** reserves the right to lower the account minimums at its discretion.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

goi employs charting, technical, fundamental, cyclical and modern portfolio theory analysis methods in developing investment strategies for its Clients. Research and analysis from **goi** are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criterion consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Adviser in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Adviser monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Adviser's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that **goi** will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that **goi** is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Adviser in evaluating a potential investment, it does not guarantee that the investment will increase in

value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The Adviser monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

Modern portfolio theory analysis is the theory of investments which attempts to maximize portfolio expected returns for a given amount of portfolio risk or to minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets.

As noted above, **goi** generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. **goi** will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, **goi** may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. **goi** will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Adviser's investment strategies as well as general risks of investing.

While the methods of analysis help the Adviser in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Adviser monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Adviser's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Adviser shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Adviser of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Adviser will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Adviser's investment strategies:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

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 has 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.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than

was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Quantitative/Algorithmic Investing

The Adviser's investment recommendations are based on proprietary algorithms. The risks associated with this type of investing are as follows:

- *Quantitative Risk:* The risk that the effectiveness of the quantitative strategy can dissipate over time as similar strategies are adopted and as the market becomes more efficiently priced.
- *Input Data Risk:* The risk that the information and data supplied to the algorithm is subject to input and quality errors. The Adviser's strategies depend on the accuracy and reliability of the data and the strategies may not function properly if the data proves to be incorrect or incomplete, or is input incorrectly.
- *Programming Risk:* The Adviser's research and strategy development process is extremely complex and the results of that process must then be translated into computer code. Although the Adviser seeks to hire individuals skilled in each of these functions and to provide appropriate levels of oversight, the complexity of the individual tasks, the difficulty of integrating such tasks, and the limited ability to perform "real world" testing of the end product raises the chances that the finished algorithm may contain an error; one or more of such errors could adversely affect a client's portfolio.
- *System Risk:* The Adviser relies extensively on computer programs and systems in its proprietary algorithms to evaluate securities, to monitor its portfolio, and to generate reports that are critical to oversight of its activities. In addition, certain systems are operated by third party service providers. The Adviser may not always be in the best position to verify the risks or reliability of such third-party systems. These programs or systems, whether operated by a third party or not, may be subject to certain defects, failures or interruptions, including, but not limited to, those caused by computer "worms," viruses and power failures. Any such defect or failure could have a material adverse effect on the Adviser's activities. For example, such failures could cause settlement of trades to fail, lead to inaccurate accounting, recording or processing of trades, and cause inaccurate reports, which may affect the Adviser's ability to monitor its investment portfolios and its risks.
- *Operational Risk:* The Adviser has developed systems and procedures to control operational risk. Operational risks arising from mistakes made in the trading confirmation or settlement of transactions, from transactions not being properly booked, evaluated or accounted for or other similar disruption in The Adviser's operations may cause the Adviser to suffer financial loss; the disruption of its business; liability to Clients or third parties; regulatory intervention; or reputational damage. The Adviser relies heavily on its financial, accounting and other data processing systems.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

Frequent Trading

Frequent trading in securities can result in higher transaction costs in the Client's account[s]. For taxable accounts, frequent trading can also result in taxable transactions each year that would not be present in a buy-and-hold strategy. There are no guarantees that a frequent trading strategy will correctly time purchases and sales of any particular security.

Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Adviser.

Item 9 – Disciplinary Information

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

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with goi. As an insurance professional, an Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Adviser.

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

A. Code of Ethics

goi has implemented a Code of Ethics (the "Code") that defines the Adviser's fiduciary commitment to each Client. This Code applies to all persons associated with goi ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Adviser's duties to each Client. goi and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of goi's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Adviser at 888-464-4742 or via email at rkhilnani@goi-ria.com.

B. Personal Trading with Material Interest

goi allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. goi does not act as principal in any transactions. In addition, the Adviser does not act as the general partner of a fund, or advise an investment company. goi does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

goi allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Adviser has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by **goi** requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Adviser has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While **goi** allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will goi, or any Supervised Person of goi, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

goi does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize **goi** to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, **goi** does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where **goi** does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Adviser and will not incur any extra fee or cost associated with using a custodian not recommended by **goi**. However, the Adviser may be limited in the services it can provide if the recommended Custodian is not engaged. **goi** may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

goi will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". **goi** maintains an institutional relationship with Schwab, whereby the Adviser receives economic benefits from Schwab (Please see Item 14 below.)

Following are additional details regarding the brokerage practices of the Adviser:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an adviser enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **goi does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Adviser receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - **goi** does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where **goi** will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Adviser will not engage in any principal transactions (i.e., trade of any security from

or to the Adviser's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). **goi** will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. **goi** will execute its transactions through the Custodian as authorized by the Client. **goi** may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Rakesh Khilnani, Chief Compliance Officer of **goi**. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify **goi** if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Adviser may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by goi

goi is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. **goi** does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. **goi** may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, **goi** may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Adviser Platform

goi has established an institutional relationship with Schwab through its "Schwab Adviser Services" unit, a division of Schwab dedicated to serving independent advisory firms like **goi**. As a registered investment adviser participating on the Schwab Adviser Services platform, **goi** receives access to software and related support without cost because the Adviser renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Adviser Services benefit the Adviser and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Adviser endeavors at all times to put the interests

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of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Adviser's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Adviser may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Adviser may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisers with access to technology, research, discounts and other services. In addition, the Adviser receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back-office support services as part of its relationship with Schwab. These services are intended to assist the Adviser in effectively managing accounts for its Clients but may not directly benefit all Clients.

Services that May Only Benefit the Adviser – Schwab also offers other services to **goi** that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Adviser to recommend Schwab, which results in a potential conflict of interest. **goi** believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Compensation for Client Referrals

The Adviser does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

Item 15 – Custody

goi does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Adviser's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct **goi** to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by **goi** to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Adviser authority to move money from one account to another account, the Adviser may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Adviser have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

goi generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by **goi**. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by **goi** will be in accordance with each Client's investment objectives and goals.

In certain circumstances, **goi** does not have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior approval from the Client. The Adviser will contact the Client and obtain approval prior to executing trades or allocating investment assets.

Item 17 – Voting Client Securities

goi does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Adviser will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither **goi**, nor its management, have any adverse financial situations that would reasonably impair the ability of **goi** to meet all obligations to its Clients. Neither **goi**, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. **goi** is not required to deliver a balance sheet along with this Disclosure Brochure as the Adviser does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

Item 19 – Requirements for State Registered Advisers

A. Educational Background and Business Experience of Principal Officer

The Principal Officer of **goi** is Rakesh Khilnani. Information regarding the formal education and background of Mr. Khilnani is included on the Form ADV 2B – Brochure Supplement.

B. Other Business Activities of Principal Officer

Mr. Khilnani's additional business activities are detailed in Item 10 – Other Financial Activities and Affiliations.

C. Performance Fee Calculations

goi does not charge performance-based fees for its investment advisory services. The fees charged by **goi** are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding goi or Mr. Khilnani. Neither **goi** nor Mr. Khilnani have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against **goi** or Mr. Khilnani.

Securities laws require an adviser to disclose any instances where the adviser or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding **goi** or Mr. Khilnani.

E. Material Relationships with Issuers of Securities

Neither **goi** nor Mr. Khilnani has any relationships or arrangements with issuers of securities.

Privacy Policy

Effective: July 2, 2024

Our Commitment to You

Global Opportune Investments LLC (“**goi**” or the “Adviser”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Adviser, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. **goi** (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

goi does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisers (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<p>Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	Yes	No
<p>Marketing Purposes goi does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where goi or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p>	No	Not Shared
<p>Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].</p>	Yes	Yes
<p>Information About Former Clients goi does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 888-464-4742 or via email at rkhilnani@goi-ria.com.