



ADV Part 2A - Firm Brochure

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This brochure provides information about the qualifications and business practices of Global Capital Strategies LLC (GCS). If you have any questions about the contents of this brochure, please contact GCS at 888-544-2634 or by email via gcs@glocapstrat.com.

The information in this brochure has not been approved or verified by the United States Securities Exchange Commission or by any state securities authority. Being registered does not imply a certain level of skill or training.

Additional information about GCS is also available on the SEC's website at www.adviserinfo.sec.gov, CRD # 290328.

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Summary of Material Changes to Form ADV Part 2A – Firm Brochure

The firm brochure provides information about the qualifications and business practices of Global Capital Strategies LLC (“GCS”). If you would like a copy of the most recent Form ADV Part 2A – Firm Brochure, you can retrieve it either via email, on our website, or by calling and requesting it.

Change in California address.

Departure of JoAnne Sturgill from Global GCS.

Item 2: Material Changes

Please see Summary of Material Changes located in Item 1, page 2.

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Item 4: Advisory Business

Global Capital Strategies, LLC (“GCS”), a Delaware limited liability company, commenced business on January 17th, 2018. The firm traces its roots back to September 28th, 2001, when Rakesh Khilnani, its founding CEO began as an independent adviser practice, operating under a corporate ADV of a major Wall Street firm. Mr. Khilnani has 26 years of experience in financial services including 19 years as a Portfolio Manager. Prior to his financial career, he was an Engineer in the automotive industry for 4 years. The investment team further includes Rajeev Dhillon and Joseph Lesko, who are Wealth Strategists with 16 years (13 in UK & 3 in USA), and 18 years of financial services experience, respectively.

The GCS team of Portfolio Manager and Wealth Strategists have transferred a majority of their clients’ assets to BNY – Pershing, from their previous custodian, Wells Fargo Clearing. So far, GCS, as of October 2nd, 2018, has transferred \$86,994,474 in assets and approximately 120 client relationships from its prior custodian and 85% of these assets are managed on a discretionary basis.

GCS was founded on the premise that significant assets demand attentive management and therefore, we have kept the number of client relationships limited. Each account is managed individually and reflects our deep understanding of each client’s stated investment objectives. We create a strategy around our clients’ wealth, which constantly evolves as family, business and economic circumstances change. We work on behalf of our clients, managing their liquid assets in public equities and ETF’s, fixed income securities, cash equivalents, private equity funds, and hedge funds, when appropriate. When appropriate opportunities arise, we will trade in international markets and when protection is deemed necessary, in declining markets, we may take reverse market exposure. We use a combination of quantitative and technical analysis to select and manage investment holdings. Client portfolios generally have exposure to both domestic and international markets. By design, our clients have liquid assets of a size that allows us to customize each portfolio and to accommodate client-specific goals and objectives. Paying attention to the distinguishing elements of each client profile, our overall objectives are protection of capital and appreciation of after-tax wealth.

GCS works with each client to develop an investment strategy and an asset allocation appropriately aligned with the client’s individual investment objectives and constraints. The Investment objective is documented on the Investment Advisory Agreement and the client’s investment strategy, asset allocation, liquidity needs, tax considerations, time horizon of investments, risk tolerance, return objectives, and source of funds are document on our contact management system. We presently do not participate in any wrap fee programs.

A Portfolio Manager and/or Wealth Strategist, who is a Registered Investment Adviser Representative, manages each client relationship. Their role is to oversee clients’ investment portfolios, make specific recommendations about how their assets are invested, be cognizant of each client’s risk profile based on their customized IPS, and understand the specific and unique needs of each client family member or business. A Client Associate and/or a Branch Administrator are responsible for portfolio accounting, client service, administration of client portfolios, and directly supports the Portfolio Manager and Wealth Strategist in managing the client relationship.

When appropriate, our team will create a comprehensive financial plan tailored to the clients needs. It covers income, debt, expenditures, insurance policies, retirement assets, trusts, savings and any other pertinent data, to give the client a holistic picture of their financial life. The plan considers the client’s current lifestyle, future allocations and can include “what-if” scenarios. The plan is monitored and reviewed with the client on a periodic basis to help guide and keep the client’s goals within target. Clients may impose certain restrictions on investing in certain securities or types of securities.

In addition, we usually coordinate tax and estate planning with other professionals to identify and implement unique and customized strategies. Similarly, when a capital raise or lending need arises for a client, we work with them to find a suitable investment bank or lender. A checklist is prepared to summarize the various tasks, deadlines and action items necessary to achieve and maintain a client’s overall goals and objectives. We are committed to offering unparalleled service and attentive investment management to achieve financial success for each of our clients.

A conflict may potentially exist between the interests of GCS’s recommendation as GCS may receive compensation for recommended insurance solutions and securities related transactions. If the client elects to act on any of the recommendations, the client is under no obligation to affect the transactions through GCS.

Item 5: Fees and Compensation

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

Advisory Fee Schedule									
Total Managed Household Value	Investment Objective								
	AG	MG	CG	AG&I	MG&I	CG&I	AI	MI	CI
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%

AG	Aggressive Growth	AG&I	Aggressive Growth & Income	AI	Aggressive Income
MG	Moderate Growth	MG&I	Moderate Growth & Income	MI	Moderate Income
CG	Conservative Growth	CG&I	Conservative Growth & Income	CI	Conservative Income

For example, if \$5 million are being invested in the Conservative growth Investment Objective, the first \$500,000 will be billed at 1.7%, the next \$500,000 at 1.28%, and the next \$4 million at 0.85%, resulting in a net fee of approximately 0.94%. On an exception basis, fees can be negotiated at the discretion of GCS, particularly in the case of portfolios and relationships with less complexity and superior advocacy. Accounts are billed as of the last day of each calendar quarter.

Clients sign a Fee Debit Authorization agreement as part of the GCS contract, which authorizes GCS and our custodian to directly debit fees from client accounts. Fees assessed on accounts initiated or terminated during a calendar quarter are prorated. Upon termination of any account, any prepaid, unearned fees will be refunded less expenses, and any earned, unpaid fees will be due and payable.

GCS's Investment Advisory Agreement fees are inclusive of, transaction fees, sales markups and GCS financial planning. Clients may incur charges and/or fees imposed by custodians, brokers or other third parties. GCS may, if deemed appropriate use Mutual funds and exchange-traded funds in clients' portfolios. These funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to GCS's fee. GCS does not receive any compensation beyond the above stated advisory fees from mutual funds. State of California Regulators view charging clients a management fee over the 3% industry average as excessive. Clients will not be charged a total management fee over the 3% industry average. Lower fees for comparable services may be available from other sources.

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

GCS does not currently charge performance-based fees.

Item 7: Types of Clients

GCS provides asset management services to businesses, individuals, high-net worth families and their related trusts, foundations, partnerships, and retirement accounts. Many of our clients have complex financial situations, which require a significant amount of attention and an integrated financial approach.

A minimum of \$1,000,000 of a client's liquid assets is suggested to begin a relationship at GCS. Under certain circumstances, the minimum account size may be adjusted.

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

We strongly believe in the importance of planning to facilitate financial success. Before establishing the investment policy statement (IPS), we make sure we understand and incorporate all of the client's goals, both present and the future. We are committed to our clients for the long term, and a complete understanding of their wishes and desires allow us to best plan and manage the portfolios.

We gather all relevant information on the clients' present financial situation including current assets and liabilities, saving capability, risk tolerance, and time horizon for investing. We merge these realities with future plans, including aspirations and major purchases, education goals, desired retirement age and income, and estate plans. This comprehensive process allows us to construct a unique investment plan and match it with the most suitable investment strategy. The investment plan is dynamic and monitored on a continual basis. If the clients' results rise above target, or fall below target, we are in communication to help make the necessary adjustments. Depending on the time frame involved, small adjustments in the present can have dramatic effects in the future.

Our investment objective options are as follows:

Aggressive Growth	Aggressive Growth & Income	Aggressive Income
Moderate Growth	Moderate Growth & Income	Moderate Income
Conservative Growth	Conservative Growth & Income	Conservative Income

We develop globally diversified, multi-asset class strategies influenced by Modern Portfolio Theory. We may incorporate reverse market exposure when deemed tactically necessary. It is important for the client to have a plan in the case of a downturn, and while no claims can be made to avoid market risk, we believe our custom dynamically diversified strategies help reduce volatility and increase potential returns over the long term.

For the equity portion of the portfolios, there are four strategies that we have developed; Core, Focus, Equity Income and Dynamic ETF. All these strategies are opportunistic and global. Our goal is to hold our winners for the long term and sell our losers quickly. This process is inherently tax efficient.

The Core Portfolio consists of approximately 40 securities when fully invested. The holdings must meet our quantitative and technical selection criteria before being added into the portfolio. The Core Portfolio's strategic allocation target is 35% large cap, 30% mid/small cap, and 35% international and alternative. Being opportunistic, we may deviate substantially from the strategic allocation when tactical indicators dictate so. The Core portfolio can tactically hold substantial cash when market declines are anticipated. 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 as a minimum.

The Focus Portfolio consists of a target of 15 securities, chosen from the Core Portfolio, that are our highest conviction picks. As such, it is a more concentrated portfolio and can therefore experience more volatility than the Core Portfolio, with the expectation of higher return over time. The securities in the Focus Portfolio typically exhibit the strongest technical indicators coupled with the best quantitative indicators and remains nearly fully invested through all market cycles. As these securities are all selected from the Core Portfolio, they may include large cap, mid/small cap, international, and alternative securities. 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 as a minimum.

The Equity Income Portfolio consists of a target of 15 high-dividend paying securities with a portfolio target yield of better than 5%. The holdings must meet our quantitative and technical selection criteria before being added into the portfolio. The Equity Income portfolio may tactically hold a substantial amount of cash when high dividend-yielding securities meeting our criteria cannot be found. The Equity Income Portfolio may include master limited partnerships (MLPs), REITS, and high dividend common stocks and ETFs. It should be noted that MLPs generate K1s. The Equity Income Portfolio typically has low correlation to the Core and Focus Portfolios and thus, can be utilized to reduce the overall long-term volatility of a composite portfolio. 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 as a minimum.

The Dynamic ETF Portfolio is attractive to clients that are partial to an indexed approach. The ETFs are selected to match the

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appropriate asset allocation that is suggested by the client's Investment Objective and are typically rebalanced on a quarterly basis. A large universe of S&P 500 Sector and international ETFs are monitored, and a portfolio is constructed utilizing a target of seven to ten ETFs that are exhibiting the strongest technical indicators. We believe that avoiding the weakest sectors can increase relative performance over time.

In order to meet the client's unique investment objective, fixed income investments are added to the portfolios in varying concentrations. The fixed income portion may consist of investment-grade bonds, high yield bonds, and exchange-traded funds (ETFs). The bonds may include corporate, treasury, agency, municipal, and foreign issues. The selected fixed income securities are typically laddered in order to manage interest rate risk and liquidity needs.

In addition to monthly statements covering the values and activity of the client's accounts provided by the custodian, we also provide access to performance reporting via Black Diamond, an affiliate of Advent. Performance is measured against the relative, appropriate benchmark of market performance. The client's Investment Objective is reviewed annually or more frequently as needed or requested by the client.

Investments in financial markets may be subject to the following risks. Although GCS works to mitigate the below risks via diversification and active portfolio management, no assurances can be made as to how successful we will be in the future as past performance is not necessarily indicative of future results.

Market risk - The risk of investments declining in value because of economic developments or other events that affect the entire market. The main types of market risk are equity risk, interest rate risk and currency risk.

- Equity risk – applies to an investment in shares. The market price of shares varies all the time depending on demand and supply. Equity risk is the risk of loss because of a drop in the market price of shares.
- 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.

Liquidity risk - The risk of being unable to sell your investment at a fair price and get your money out when you want to. To sell the investment, you may need to accept a lower price.

Concentration risk - The risk of loss because your money is concentrated in 1 investment or type of investment. When you diversify your investments, you spread the risk over different types of investments, industries and geographic locations.

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. For example, long-term Canadian government bonds have a credit rating of AAA, which indicates the lowest possible credit risk.

Reinvestment risk - The risk of loss from reinvesting principal or income at a lower interest rate. Suppose you buy a bond paying 5%. Reinvestment risk will affect you if interest rates drop and you have to reinvest the regular interest payments at 4%. Reinvestment risk will also apply if the bond matures and you have to reinvest the principal at less than 5%. Reinvestment risk will not apply if you intend to spend the regular interest payments or the principal at maturity.

Inflation risk - The risk of a loss in your purchasing power because the value of your investments does not keep up with inflation. Inflation erodes the purchasing power of money over time – the same amount of money will buy fewer goods and services. Inflation risk is particularly relevant if you own cash or debt investments like bonds. Shares offer some protection against inflation because most companies can increase the prices they charge to their customers. Share prices should therefore rise in line with inflation. Real estate also offers some protection because landlords can increase rents over time.

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Horizon risk - The risk that your investment horizon may be shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time when the markets are down, you may lose money.

Longevity risk - The risk of outliving your savings. This risk is particularly relevant for people who are retired or are nearing retirement.

Foreign investment risk - The risk of loss when investing in foreign countries. When you buy foreign investments, for example, the shares of companies in emerging markets, you face risks that do not exist in Canada, for example, the risk of nationalization.

Item 9: Disciplinary Information

Neither GCS, nor any management persons, has had any criminal actions brought against them.

Neither GCS, nor any management persons, has had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

Neither GCS, nor any management persons, has had a self-regulatory organization (SRO) proceeding.

Individuals can view all Global Capital Strategies LLC disclosures at www.adviserinfo.sec.gov.

Item 10: Other Financial Industry Activities and Affiliations

GCS is not a registered broker/dealer with FINRA and has no plans on doing so. Neither GCS nor any of its management personnel are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading IAR, or an associate person of the foregoing entities.

GCS may have management personnel or related persons that are involved in other financial industry activities and affiliations. GCS's IARs are dually registered as Registered Representatives with Cantella & Co, Inc. ("Cantella") and it may pose a potential conflict of interest. Cantella is a registered broker-dealer, member FINRA and SIPC. Further, certain GCS IARs are licensed insurance agents and may pose a potential conflict of interest.

Each IAR at GCS is required to disclose if he/she participates in any outside business activities, whether financial industry activities or not. In reviewing outside activity requests, GCS will determine if there is a conflict of interest and ultimately approve or deny the activity. Approved outside activities will be disclosed on the IARs supplemental brochure. Clients can also review any IARs outside activity through www.FINRA.org in the broker check portion of the website. Some of GCS's IARs are licensed to sell insurance to clients and may recommend suitable policies when a client need is determined.

GCS does not receive compensation, directly or indirectly, for recommending or selecting other investment advisers for its clients.

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

GCS has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading and rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other policies. All supervised persons at GCS must acknowledge and accept the terms of the Code of Ethics annually, or as amended.

GCS anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which GCS, its affiliates and/or clients, directly or indirectly, have a position of interest. GCS's employees and persons associated with GCS are required to follow GCS's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of GCS and its affiliates may trade for their

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own accounts in securities, which are recommended to and/or purchased for GCS's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of GCS will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of GCS's clients. In addition, the Code requires pre-clearance of most transactions, and restricts trading in close proximity to client trading activity, unless the associates trade is included with the clients' order and does not obtain more favorable pricing than the client. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees could inadvertently benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics, to reasonably prevent conflicts of interest between GCS and its clients. It is GCS's policy that the firm does not affect any principal or agency cross securities transactions for client accounts. GCS also does not cross trades between client accounts.

GCS personnel may from time-to-time obtain certain non-public information. All firm personnel understand that they are never allowed to act on this information for their own accounts and/or any GCS clients and/or share this information with persons outside of the firm. In certain cases, the firm's compliance department may deem it necessary to conduct heightened reviews of individual securities.

GCS believes that all material conflicts of interest have been disclosed in this document. The GCS Code of Ethics will be provided to any client or prospective client upon request.

Item 12: Brokerage Practices

GCS recommends that clients establish investment accounts with BNY - Pershing Advisor Solutions ("PAS"), a FINRA-registered broker-dealer, to affect trades for their accounts. Custody of client assets is maintained by BNY - Pershing LLC, which is presently the largest worldwide custodian. Both broker and custodian are wholly owned subsidiaries of Bank of New York Mellon ("BNY Mellon"), the oldest continuously operating financial organization in the United States. GCS is independently owned and operated and not affiliated with BNY - PAS or BNY - Pershing LLC.

As an investment adviser, GCS has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded (including volume, price, and bid-offer spread), the size of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. GCS's primary objective when placing orders for the purchase and sale of securities is to obtain the most favorable net results for its clients.

PAS's products and services that assist GCS in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of GCS's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

In the event the client is not able, or willing to move custody of their assets to PAS, GCS may advise or manage the client's assets at a custodian other than PAS.

GCS may combine orders into block trades when more than one account is participating in a trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of obtaining a more favorable or consistent execution price). Block trading is performed with the duty to seek best execution and is consistent with the terms of GCS's investment advisory agreement. Equity trades are blocked based upon fairness to clients, both in the participation of their accounts, and in the allocation of orders for the accounts of other clients.

Allocations of all orders are performed in a timely and efficient manner. Generally, all managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day may be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days.

If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. GCS may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

GCS does not presently sponsor or participate in wrap fee programs.

Item 13: Review of Accounts

Each GCS client has a Registered Investment Adviser Representative that performs ongoing account reviews. The review team typically consists of a Wealth Strategist and / or a Portfolio Manager. Portfolio rebalancing analysis is performed at regular intervals or when deemed appropriate in light of developments relating to general market events, specific security holdings, change in client circumstance or when requested by the client.

Clients have 24/7 online access to their brokerage account at the custodian website. Clients receive monthly account statements (or quarterly if there is no activity) from the custodian and confirmation of trading activity as it occurs. Additionally, for advisory relationships, clients have access to Black Diamond, an independent business group of Advent Software, which provides them with daily online detailed performance reporting and risk assessment of their holdings.

An annual review of performance, investment objective and if prepared, the financial plan, is offered to clients. Clients may request an update, as needed, by contacting GCS.

Item 14: Client Referrals and Other Compensation

GCS does not presently receive any economic benefits for providing investment advice or other advisory services from someone who is not a client.

GCS does not presently, directly or indirectly, compensate any person who is not under our supervision for client referrals.

Item 15: Custody

Although GCS does not take custody of client assets, it is deemed to have custody of funds solely as a result of its authority to make withdrawals from clients' accounts to pay its advisory fees, under California Code of Regulation, section 260.237(b)(3). In order to provide appropriate safeguards, GCS has written authorization from the client to deduct advisory fees from the account held with our qualified custodian, Pershing Advisor Solutions (PAS). GCS provides PAS with an invoice itemizing the fee which is calculated by formulas coded into BlackDiamond, consistent with the signed Advisory Agreement. PAS subsequently deducts the stated amount from clients' accounts and provides clients with a statement itemizing the fee and the time period it covers. Investment management fees are further itemized via BlackDiamond online access provided to advisory clients, stipulating the assets used for calculation purposes, the amount of fee and the quarter that it covers. Clients should review their statements carefully and contact GCS with any questions.

Item 16: Investment Discretion

Upon signing the GCS management agreement, clients delegate limited trading authority over their managed assets. This provides GCS the authority to determine the securities and number of shares to be bought or sold for a client's account. Any exceptions to this discretion are discussed and mutually agreed upon by the client and GCS. After developing an IPS (as explained in Item 4 of this Brochure), GCS uses its discretion to create an asset allocation and establish individual security positions within client accounts. In all cases, such discretion is exercised in a manner consistent with GCS's understanding of the clients' investment objectives.

Item 17: Voting Client Securities

GCS 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. Clients can review ISS's voting policy by going to the below website.

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

Item 18: Financial Information

GCS is not required to provide clients with a balance sheet as GCS does not require or solicit prepayment of fees of more than \$500 per client six months or more in advance.

GCS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of any claim, bankruptcy or other financially related proceeding.

Item 19: Requirements for State-Registered Advisers

ADV Part 2B – Supplemental brochure for Controlling Person at GCS.

Additional information about **Rakesh Khilnani** (CRD# 2259700) is available on the SEC's website at www.adviserinfo.sec.gov and FINRA's website at www.finra.org/brokercheck.

Financial Adviser Information

Name: Rakesh Khilnani
Address: 801 Brickell Avenue, 9th Floor, Miami FL, 33131
Phone: 888-544-2634

Educational Background & Business Experience

Year of Birth: 1963
Education: Wayne State University – College of Engineering
Business: CEO, Portfolio Manager: Global Capital Strategies LLC: From: 1/19/18 To: Present
Branch Manager: Cantella & Co., Inc.: From: 1/19/18 To: Present
Managing Principal, PIM Portfolio Manager: Wells Fargo Advisors Financial Network: From: 9/28/2001 To: 1/19/18
Senior Vice President: RBC Wealth Management: From: 3/20/1995 To: 9/28/2001

Disciplinary Information

There are no legal or disciplinary event(s) to disclose for Rakesh and he has not been involved in any of the events listed below.

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

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An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

Further Rakesh has not been the subject of any bankruptcy.

Other Business Activities

President: Khilnani Wealth Management LLC

Managing Partner: Amdia Partners LLC

President: Aysara Capital LLC

Real Estate investment from which income or rent is derived.

Presently, no products or services are offered to GCS clients from the Other Business Activities noted above.

Adviser's may have an incentive to recommend certain Programs or services over others based on various compensation factors. Rakesh Khilnani intends, however, to make all recommendations independent of any compensation considerations and based solely on the client's objectives and needs. The firm has a supervisory structure in place to review for potential conflicts of interest.

Rakesh is also registered with Cantella & Co., Inc. ("Cantella") a Broker Dealer (CRD# 13905). When providing brokerage services to clients, representatives typically receive payment in the form of commissions or sales loads and may also receive mutual fund trails.

Additional Compensation

Rakesh does not receive any additional compensation, nor participate in any sales awards, nor other prizes.