

Item 1- Cover Page

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This Brochure Supplement provides information about Eric Zine that supplements the Bolton Global Asset Management (“BGAM”) Form ADV Part II (A) Brochure. You should have received a copy of that Brochure. Please contact Jane Mahle, Chief Compliance Officer, if you did not receive BGAM’s Form ADV Part II (A) Brochure or if you have any questions about the contents of this supplement.

Additional information about Eric is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Eric Zine

Year of Birth: 1972

Education History:

- Graduated in 1995 from Bryant University with Bachelor of Science in Business Administration.
- Obtained Certificate in Financial Planning from Boston University in 2002.
- New England School of Law, Boston, MA, Juris Doctor, graduate May 2009. Admitted to the Massachusetts Bar to practice law by completing educational and examination requirements.
- CERTIFIED FINANCIAL PLANNER™ certification. Requirements include obtaining bachelor’s degree, three years financial planning experience, completion of CFP-board registered program or higher education beyond bachelor’s degree, passing of two-day final certification examination. CFP® professionals are required to complete 30 credit hours of continuing education (CE) accepted by Certified Financial Planner Board of Standards (CFP Board) every two years, including 2 hours of CFP Board-approved

ADV PART II (B)

Ethics CE. CFP® professionals shall also abide by the CFP Board's strict Code of Ethics and Professional Responsibility and Financial Practice Standards, to put his or her client's interest first.

- Certified Divorce Financial Analyst (CDFA®). Requirements include initial three years of professional experience in finance or divorce and a Bachelor's degree, four module self-study courses that cover a broad range of topics regarding the financial aspects of divorce, and the passing of four examinations, which include a comprehensive case-study exam. CDFA® professional are required to complete 15 hours of continuing education every two years.

Business Background:

Currently maintains a Series 7 license (obtained 8.25.1999), allowing to provide securities brokerage services as a Registered Representative ("RR"). Also maintains a Series 65 license (obtained 9.20.1999), allowing to provide investment advisory services as an IAR.

- Currently is a RR with Bolton Global Capital ("BGC") and IAR with BGAM. Began 10.5.2009. Does business under 'Elm Tree Capital LLC'. Title is 'President, Private Wealth Advisor'.
- From 11.2001 until 10.2009, was employed with Citigroup Global Markets. Title was 'Financial Advisor'.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item.

Item 4- Other Business Activities

- 1) BGAM and Eric are affiliated with BGC, a FINRA Member Broker-Dealer. Eric is associated with BGC as an RR, and, in this capacity, receives commissions on a trade-by-trade basis, bonuses or other compensation based on the sale of securities or other investment products. Additionally, compensation includes distribution or service ("trail") fees from the sale of mutual funds. Sales of commission-based products create conflicts of interest and gives the supervised person an incentive to recommend investment products based on the compensation received, rather than the client's needs. Neither Eric nor BGAM receive any ongoing advisory fees in connection with any products or services implemented in the Eric's separate capacity as an RR of BGC.

ADV PART II (B)

- 2) As a dually registered RR with BGC and IAR with BGAM, Eric does business under Elm Tree Capital LLC. Eric is owner of this public-facing LLC, and operates under the title 'President, Private Wealth Advisor'. This LLC is not directly tied to investments, but Eric markets her investment services as an RR and IAR under this LLC. This LLC is operated from the Branch location. Time spent on management duties of LLC is nominal, not exceeding of 10% of time during business hours per month. LLC was filed 11.30.2009.
- 3) Eric, since 2010, is also a licensed insurance professional, allowing for the sale of term, permanent, long-term care and/or fixed annuity insurance sales. This is done from his Branch location. Implementation of insurance recommendations are separate and apart from Eric's role with BGAM or BGC. As an insurance professional, Eric receives customary commissions and other revenue from various insurance companies whose products are sold. Eric is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest inasmuch as it creates an incentive to recommend insurance products where Eric receives greater overall compensation under the insurance arrangement as opposed to other investment options. Clients are under no obligation to implement any insurance recommendations made by Eric. BGAM monitors Eric's insurance recommendations to identify and mitigate the inherent conflict of interests.
- 4) Attorney at law working as a sole-proprietor under 'Law Office of Eric Zine'. This is not investment related activity. Conducted from the branch office location. Eric spends approximately 20 hours per month on activity – 5 hours during trading hours. Began in 2010.

Item 5- Additional Compensation

Because Eric is also an RR of BGC, an affiliated FINRA Member broker-dealer, Eric may receive selling compensation from BGC for the facilitation of certain securities transactions on Client's behalf through BGC. This arrangement presents a conflict of interest and may give Eric incentive to recommend investment products based on the compensation received, rather than the client's needs. BGC monitors the receipt of selling compensation by its supervised persons to identify potential conflicts of interest and manage any conflicts identified.

Some of Eric's brokerage clients through BGC are concurrently advisory clients of BGAM. Eric's relationship with BGC creates a conflict of interest inasmuch as Eric has an incentive to recommend that clients purchase or sell investments in a BGC brokerage account rather than in an advisory account where he receives greater overall compensation under the brokerage arrangement. BGAM monitors Eric's brokerage and advisory relationships and compensation to identify and mitigate the inherent conflicts of interest.

ADV PART II (B)

Mutual Funds are recommended by Eric to BGAM and BGC clients. Eric may recommend a mutual fund share class that includes an ongoing payment to BGC and Eric called a “trailing” fee or a 12b-1 fee (named after the rule that authorizes these types of payments). In some instances, a lower-cost share class that does not include this trail payment is also available for the BGAM or BGC client to invest in. The payment of the trailing fees to BGC and Eric represent a conflict of interest inasmuch as the trailing payment serves as an inducement for Eric to recommend the trail-paying share class. BGAM monitors Eric’s mutual fund share class selection to identify and mitigate the inherent conflict of interest.

Eric considers the receipt of trail revenue and/or selling compensation in setting, maintaining and/or assessing the advisory fee on your account. You are encouraged to contact Eric with any questions on this additional compensation and its relation to the advisory fee charged to your account.

Eric conducts Outside Business Activities that are referenced in Item 4 of this document. Outside Business Activities for Eric should be reviewed and understood. Certain Outside Business Activities include additional compensation, even from a client, to Eric, which creates a conflict of interest. BGC and BGAM require its RRs and IARs to provide pre-written disclosure of any Outside Business Activity so that the activity may be appropriately reviewed and supervised.

Item 6 - Supervision

Ronald Fremault, Director of Supervision, is responsible for the supervision of the supervised persons. The Firm has developed and adopted a compliance program and Code of Ethics procedures. This program involves monitoring the operations of the Firm and its supervised persons. Ronald Fremault can be reached at 978-779-5361, ext. 2242.