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AUG 5 2005

NASD
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. E072004014301

NASD, Inc.
Florida District Office

TO: Department of Enforcement
NASD

RE: Global Strategic Investments, LLC, Respondent
CRD No. 117028

Justin DalMolin, Respondent
Financial and Operations Principal
CRD No. 4666567

Pursuant to Rule 9216 of NASD Code of Procedure, Respondents Global Strategic, LLC and Justin DalMolin submit this Letter of Acceptance, Waiver and Consent ("AWC") for the purpose of proposing a settlement of the alleged rule violations described in Part II below. This AWC is submitted on the condition that, if accepted, NASD will not bring any future actions against me alleging violations based on the same factual findings.

We understand that:

1. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by NASD's Department of Enforcement and National Adjudicatory Council ("NAC") Review Subcommittee or Office of Disciplinary Affairs ("ODA"), pursuant to NASD Rule 9216;
2. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against us; and
3. If accepted:
 - a. this AWC will become part of our permanent disciplinary record and may be considered in any future actions brought by NASD or any other regulator against us;
 - b. this AWC will be made available through NASD's public disclosure program in response to public inquiries about our disciplinary record;
 - c. NASD may make a public announcement concerning this agreement and the subject matter thereof in accordance with NASD Rule 8310 and IM-8310-2; and

- d. We may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any allegation in this AWC or create the impression that the AWC is without factual basis. Nothing in this provision affects our testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which NASD is not a party.

We also understand that our experience in the securities industry and disciplinary history may be factors that will be considered in deciding whether to accept this AWC. That experience and history are as follows:

Respondent Global Strategic Investments, LLC ("Global Strategic") is currently and was during all time relevant hereto, a member of NASD and registered as a broker/dealer with the United States Securities and Exchange Commission. Global Strategic became registered with NASD in 2002 and has no prior disciplinary history.

Respondent Justin DalMolin is currently and was during all time relevant hereto, the Chief Financial Officer and Financial and Operations Principal of Global Strategic Investments, LLC. DalMolin first became registered with NASD as a financial and operations principal in 2003. DalMolin has no prior disciplinary history.

I.

WAIVER OF PROCEDURAL RIGHTS

We specifically and voluntarily waive the following rights granted under NASD's Code of Procedure:

- A. To have a Formal Complaint issued specifying the allegations against us;
- B. To be notified of the Formal Complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made and to have a written decision issued; and
- D. To appeal any such decision to the NAC and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, we specifically and voluntarily waive any right to claim bias or prejudgment of the General Counsel, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including acceptance or rejection of this AWC.

We further specifically and voluntarily waive any right to claim that a person violated the ex parte prohibitions of Rule 9143 or the separation of functions prohibitions of Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

II.

ACCEPTANCE AND CONSENT

- A. We hereby accept and consent, without admitting or denying the allegations or findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of NASD, or to which NASD is a party, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by NASD:

1. On August 31, 2004 and September 30, 2004, Respondent Global Strategic, acting through Respondent Justin DalMolin, conducted a securities business while failing to maintain the minimum net capital required by SEC Rule 15c3-1. Respondent Global Strategic's net capital requirement on August 31, 2004 and September 30, 2004 was \$100,000. The firm's net capital on August 31, 2004 was \$45,953.14, causing a deficiency of \$54,046.86. The firm's net capital on September 30, 2004 was \$45,739.77, causing a deficiency of \$54,260.23. The net capital deficiencies resulted from the failure to book as liabilities legal fees due to the firm's counsel and from negative account balances reflected on its clearing firm statement entitled "Trade Rejects."

Such acts, practices, and conduct constitute separate and distinct violations of Section 15(c) of the Securities Exchange Act of 1934, Rule 15c3-1 thereunder and NASD Conduct Rule 2110 by Global Strategic Investments, LLC, and violation of NASD Conduct Rule 2110 by Justin DalMolin.

2. Global Strategic Investments, LLC, acting through Justin DalMolin, violated SEC Rules 17a-3 and 17a-5, in that Global Strategic's original net capital computations for the periods ending on or about August 31, 2004 and September 30, 2004; and its FOCUS reports for the periods ending on or

about August 31, 2004 and September 30, 2004, were all materially inaccurate for the reasons described in paragraph 1 above.

Such acts, practices and conduct constitute separate and distinct violations of Section 15(c) of the Securities Exchange Act of 1934, Rules 17a-3 and 17a-5 thereunder and NASD Conduct Rules 3110 and 2110 by Global Strategic, and violations of NASD Conduct Rule 2110 by Justin DaMolin.

- B. We also consent to the imposition, at a maximum, of the following sanctions:

A censure and a monetary fine in the amount of \$10,000, jointly and severally against Global Strategic Investments, LLC and Justin DaMolin

The sanctions imposed herein shall be effective on a date set by NASD staff.

III.

OTHER MATTERS

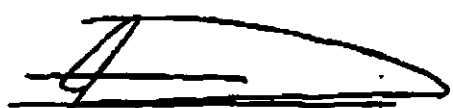
- A. We understand that we may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. We understand that we may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by NASD, nor does it reflect the views of NASD or its staff.
- B. We agree to pay any monetary sanctions imposed on us upon notice that this AWC has been accepted and that such payments are due and payable and have attached an Election of Payment form showing the method by which I propose to pay any fine imposed.
- C. We specifically and voluntarily waive any right to claim that we are unable to pay, now or at any time hereafter, any monetary sanction imposed in this matter.

We certify that we have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it, and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein, has been made to induce us to submit it.

Date:

8/2/05


Global Strategic Investments, LLC
By: Cesar Hernandez, CEO
(Name and title)


Justin DalMolin

Reviewed by:


Counsel for Respondents
Kelley J. Peterson
Holland & Knight LLP

Accepted by NASD:

Date: 8/5/05


Mitch Atkins, District Director
Signed on behalf of the Director of ODA,
by delegated authority