

Blue Marble Investments, LLC
CRD #141354

1117 State Street Ste 85
Santa Barbara, CA 93131

805.595.1820

www.bluemarble.com

www.earthfolio.net

Form ADV, Part 2A Brochure

May 6, 2026

This brochure provides information about the qualifications and business practices of Blue Marble Investments, LLC. If you have any questions about the contents of this brochure, please contact us at 805.595.1820. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Any reference to or use of the terms "registered investment adviser" or "registered," does not imply that Blue Marble Investments, LLC or any person associated with Blue Marble Investments, LLC has achieved a certain level of skill or training.

Additional information about Blue Marble Investments, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 - MATERIAL CHANGES

Billing Method Update:

Blue Marble Investments, LLC has updated its fee billing practices to provide that advisory fees are billed quarterly in advance instead of quarterly in arrears. Corresponding revisions have been made to this brochure to reflect the change, including disclosure regarding the proration and refund of unearned fees upon termination of the advisory relationship.

Custody Disclosure Update:

The brochure has also been revised to clarify disclosures related to the deduction of advisory fees and the firm's limited custody status.

Assets Under Management Update:

Blue Marble Investments, LLC has updated the assets under management information disclosed in this brochure to reflect current regulatory assets under management as of the date of this amendment.

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ITEM 4 - ADVISORY BUSINESS

Description of Advisory Firm

Blue Marble Investments, LLC ("Blue Marble," "BMI", "we," "our," or "us") is a privately owned limited liability company headquartered in Santa Barbara, California, and is an SEC registered investment adviser.

Blue Marble is a socially active investment firm that offers managed portfolios that promote social progress and environmental sustainability. Blue Marble registered as an independent investment adviser in 2007. From 2000 to 2007, Blue Marble's manager provided socially responsible investment advice through another registered investment advisory firm. Arturo Tabuenca is Blue Marble's Managing Member and principal owner. Linda Shelby is Chief Compliance Officer/Chief Administrative Officer and 5% Owner. Robert Shelby is an LLC member and 5% owner. Mr. Shelby is not currently registered as an investment adviser representative, will not provide investment advice to clients, and is not actively engaged in managing Blue Marble Investments, LLC. Sierra Smith, Investment Adviser Representative, holds the CERTIFIED FINANCIAL PLANNER™ (CFP®) designation, awarded by the Certified Financial Planner Board of Standards, Inc. Additional information regarding Ms. Smith's educational background, business experience, and professional qualifications is provided in her Form ADV Part 2B Brochure Supplement.

Advisory Services Offered

EarthFolio® Accounts

In 2007, Blue Marble launched the EarthFolio portfolio series. EarthFolio is a collection of online professionally managed portfolios that feature ESG screened (environmental, social, governance) funds. EarthFolio is offered through a wrap fee program. The EarthFolio model portfolios are designed to diversify the client's assets and are available in a range of asset allocation strategies to address various investment objectives. These services are provided on a discretionary basis only.

Prior to opening an account, a client will complete a questionnaire on the website, which once completed will suggest the most appropriate model based on the answers provided by the client that pertained to the client's investment objectives, risk tolerance, and investment time horizon. If the client decides to open an account with Blue Marble, the client will complete an application and receive new account forms online, including an investment advisory agreement and Blue Marble's Form ADV Part 2 brochure.

Other Client Relationships

Before Blue Marble registered as an investment adviser, Blue Marble's manager Arturo Tabuenca provided investment advice to clients through Commonwealth Financial Network ("CFN"), a registered investment adviser. In 2007, Arturo Tabuenca terminated his working relationship with CFN, and Blue Marble became registered as an investment adviser. Blue Marble manages accounts according to each client's individual investment objectives and in the same style and same manner as they were managed at CFN. The management of these accounts may differ in part in terms of the asset allocation, security selection, and timing of transactions from the management of Blue Marble's EarthFolio accounts that are managed according to the range of portfolio styles available. Blue Marble also accepts new clients that want a more customized portfolio and do not want an EarthFolio account. These services are provided on a discretionary basis only.

Services Limited to Specific Types of Investments

In these accounts, we primarily invest in mutual funds and ETFs, but may also utilize additional types of investments if they are appropriate to address the individual needs, goals, and objectives of the client or in response to client request. We describe the material investment risks for the primary securities that we utilize under the heading Specific Security Risks in Item 8 below. Blue Marble may offer investment advice on any investment held by the client at the start of the advisory relationship including, but not limited to, common and preferred stocks, warrants or rights of domestic or foreign corporations, bonds, notes, and debentures. While these products are not part of our typical advisory strategies, in certain instances they may be incorporated into a client's actively managed portfolio rather than liquidated.

We discuss our discretionary authority below under **Item 16 - Investment Discretion**. For more information about the restrictions clients can put on their accounts, see Tailored Services and Client Imposed Restrictions in this Item below.

We describe the fees charged for the EarthFolio model portfolios and other client relationships under **Item 5 - Fees and Compensation**, below.

Tailored Services and Client Imposed Restrictions

Clients investing in EarthFolio accounts will complete a web-based interactive questionnaire which contains questions about the investor's time horizon and risk tolerance. The questionnaire is designed to help the investor determine his/her appropriate investment profile based on the answers he/she provides and to recommend the EarthFolio portfolio that appears to best match his/her appropriate profile. Clients are restricted to the designated model positions and allocations and may not tailor it to their preferences. Blue Marble manages the EarthFolio portfolios based on the investment strategy discussed below under - Methods of Analysis, Investment Strategies, and Risk of Loss.

For clients seeking a more tailored approach outside of EarthFolio, specific investment needs and goals are determined via client interviews and a written investor profile. Tailored services typically include tax- free bonds, individual equities, and institutional-class shares. Our investment advice may not be suitable if the client does not provide us with accurate and complete information. It is the client's responsibility to keep Blue Marble informed of any changes to their investment objectives or restrictions.

Outside of the EarthFolio accounts, clients may request other restrictions on the account, such as when a client needs to keep a minimum level of cash in the account or does not want Blue Marble to buy or sell certain specific securities or security types in the account. Blue Marble reserves the right to not accept and/or terminate management of a client's account if we feel that the client-imposed restrictions would limit or prevent us from meeting or maintaining the client's investment strategy.

Wrap Fee Programs

Blue Marble sponsors and acts as Portfolio Manager in our own wrap fee program, featuring EarthFolio portfolios. The wrap fee program is described in our Form ADV Part 2A Appendix 1 wrap fee program brochure.

Assets Under Management

As of May 6, 2026, Blue Marble's assets under management totaled \$205,057,533.

ITEM 5 - FEES AND COMPENSATION

Investment Management Services

EarthFolio Accounts

Clients' EarthFolio accounts are charged an annual management fee of 0.50% of assets under management. EarthFolio fees are charged quarterly in advance. The advisory fee is determined by the account's market value as of the last business day of the prior quarter. Clients do not pay transaction fees for transactions in EarthFolio accounts, but may pay other fees charged by the custodian, as noted below. Blue Marble does not negotiate fees on its EarthFolio Wrap Accounts.

Investment Advisory Accounts

Client accounts managed outside of the EarthFolio models are charged an annual management fee based on the value of assets under management according to the following fee schedule:

Account Fee Schedule

Assets Under Management		Annual Management Fee
First	\$500,000 or portion	1.10%
Next	\$500,000 or portion	.65%
Next	\$1,000,000 or portion	.55%
Next	\$3,000,000 or portion	.50%
Next	\$5,000,000 or portion	.35%
Over	\$10,000,000	.20%

Management fees are charged quarterly in advance. Blue Marble may negotiate fees in certain instances, particularly for charitable institutions or corporate clients. Multiple portfolios owned by one household may be considered as one account to qualify for lower overall fees (except business accounts). Lower fees for comparable services may be available from other sources. Aggregated account information will be included on Schedule A of Client Agreement.

Additional Client Relationships

Arturo Tabuenca is a licensed insurance agent and registered securities representative of Purshe Kaplan Sterling Investments ("PKS"), a non-affiliated registered broker-dealer and a member of the Financial Industry Regulation Authority ("FINRA"). Mr. Tabuenca's activity with PKS represents a minority of his time and is generally only conducted upon client request or for products outside the scope of Blue Marble's socially responsible objective. A conflict of interest exists to the extent that Mr. Tabuenca receives commissions and/or trailing service fees (12b-1 fees) related to the sale of commissionable products and this practice gives him an incentive to recommend products based on the compensation received, rather than on the client's needs. Therefore, clients are advised that the client is under no obligation to act on these recommendations or purchase commissionable products through Mr. Tabuenca as a registered representative. In all cases, insurance commissions will be fully disclosed to the client.

Commissions from these products are separate from any fees that Blue Marble receives for advisory services. Clients have the right to utilize or decline to utilize the services of any representative of Blue Marble in their outside capacity and have the right to purchase services or products recommended by Blue Marble through another provider.

Billing Method

All management fees are billed quarterly in advance based on the market value of assets under management as of the last business day of the prior billing period and are not adjusted for changes in account value during the current billing period. Because advisory fees are based on the amount of assets under management, Blue Marble has an incentive to encourage clients to increase the assets in their accounts. In addition, because fees are billed in advance, the firm has an incentive to retain clients throughout the billing period.

For new accounts, the initial fee will be prorated based on the number of days remaining in the billing period. Upon termination of the advisory agreement, any unearned fees will be promptly refunded to the client, and any earned but unpaid fees will be due and payable.

Clients authorize Blue Marble, in writing, to deduct advisory fees directly from their accounts held with the qualified custodian. Such authorization is included in the advisory agreement. Each time a fee is deducted, the qualified custodian will reflect the advisory fee on the client's account statement. Clients are encouraged to review these statements carefully and compare the fees charged with the fee schedule described in this brochure and their advisory agreement. Clients may contact Blue Marble with any questions on fee calculations.

Termination

Clients may terminate the advisory agreement without penalty within five (5) business days of signing the agreement. Thereafter, either party may terminate the advisory relationship at any time upon written notice. Advisory fees are billed quarterly in advance. Upon termination of the advisory agreement, Blue Marble will calculate the unearned portion of any prepaid advisory fees based on the number of days remaining in the billing period. Any unearned fees will be promptly refunded to the client. If any earned but unpaid fees remain due at the time of termination, Blue Marble will invoice the client for such amounts, and payment will be due upon receipt.

In the event of a client's death or cognitive impairment, Blue Marble will continue management of the account until an authorized party notifies us of the client's death or cognitive impairment and gives us alternative instructions.

Other Fees and Expenses

This brochure describes Blue Marble's non-wrap fee advisory services; clients utilizing Blue Marble's wrap fee portfolio management should see the separate Wrap Fee Program Brochure for additional details regarding third party fees. Client accounts not participating in the wrap fee program are responsible for the payment of all third-party fees (i.e., custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, etc.). Clients pay all transaction charges for institutional shares, individual stocks and bonds, account transfer fees, and/or other similar charges incurred in connection with transactions in accounts, from the assets in the account. These charges are in addition to the fees clients pay to Blue Marble. In addition, all fees paid to Blue Marble for investment management services are separate and distinct from the fees and expenses charged within mutual funds or exchange traded funds held in a client's account. Mutual funds and ETFs charge internal management fees and operational costs, including 12b-1 fees. These fees are indirectly charged to all holders of the fund shares. Blue Marble investment adviser representatives do not receive 12b-1 fees for investment advisory assets for which they are receiving a management fee. (Advisors may receive 12b-1 fees for client brokerage accounts in their capacity of registered representatives with PKS.)

Clients with mutual funds or ETFs in their portfolios are effectively paying both Blue Marble and the fund manager for the management of their assets. A client could invest in a mutual fund or ETF directly, without using our services. In that case, the client would not receive the benefit of services we provide, which includes analyzing and selecting funds, reviewing that the funds follow ESG practices, determining a proper allocation mix, systematic rebalancing, and tax management. Accordingly, the client should review both the internal fees charged by the funds and the advisory fees we charge to understand the total amount of fees the client will pay and evaluate the advisory services we provide accordingly.

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

Blue Marble does not charge performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client and therefore does not engage in side-by-side management.

ITEM 7 - TYPES OF CLIENTS

Blue Marble primarily provides investment advisory services to individuals (including high net worth individuals, trusts and estates, and individual participants of retirement plans). In addition, we offer advisory services to charitable organizations and businesses.

Account Requirements

The minimum investment required by an individual client is generally \$500,000. The minimum account size for accounts invested according to the EarthFolio models is \$25,000. Accounts below these minimums may be accepted on an individual basis at Blue Marble's discretion.

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

EarthFolio Model Portfolios

The EarthFolio models are socially and environmentally screened portfolios designed to provide a diversified asset allocation to clients based on the client's investment objectives and risk tolerance.

EarthFolio comes in a range of portfolio styles, each designed to help match the needs of varying investors based on their individual goals, risk tolerances, and time horizons.

The EarthFolio Investment Process

Blue Marble follows a multi-step process in determining the securities to include in the model portfolios:

Step 1 - Fund Universe: EarthFolio invests exclusively in funds categorized as Sustainable or Socially Responsible, which are screened for environmental, social, and corporate governance (ESG) factors.

Step 2 - Asset Allocation: EarthFolio models are strategically allocated across a range of portfolio objectives designed to maximize long-term returns and lower risk.

Step 3 - Fund Selection: Final fund selections are made based on relative quality and performance in areas such as capitalization, style consistency, operating expenses, and passive management.

Step 4 - Portfolio Construction: Portfolios are implemented based on client's responses to the investment questionnaire identifying their investment goals and risk tolerances.

Step 5 - Management and Monitoring: Individual asset allocations are periodically rebalanced to their original portfolio objectives and underlying funds are monitored relative to peer performance and benchmarks.

Blue Marble monitors the performance of each holding against a stated benchmark. Additionally, active rebalancing is employed by Blue Marble in an effort to maintain the portfolio's integrity and enhance its ability to pursue long-term growth.

EarthFolio's Integration of ESG Criteria

EarthFolio models are globally diversified and invest in a broad range of equity funds, fixed-income funds, and money market funds. Funds selected for EarthFolio must pass rigorous financial screens, and just as importantly, invest in companies committed to ethical practices. Ethical practices fall into three broad categories: the environment, social progress, and corporate governance.

This type of investing is classified as Socially Responsible Investing, Sustainable Investing or Environmental, Social, and Governance (ESG) Investing, and is the hallmark of EarthFolio. Some of the most common ESG screens employed include:

- Conservation
- Clean Tech
- Equality and Diversity
- Human Rights
- Fair Labor
- Animal Welfare
- Non-Violence
- Corporate Governance
- Healthy Living
- Community Development

Investment Advisory Accounts

For clients seeking a more tailored approach outside of EarthFolio, specific investment needs and goals are determined via client interviews and a written investor profile. Tailored services may include tax-free bonds, individual equities, and institutional-class shares.

Blue Marble uses strategic portfolio management and carefully selects funds based on key metrics such as category integrity, verifiable ESG criteria, adherence to index performance, low operating expenses, etc.

We gather our information from a variety of sources, including financial newsletters and websites, third party research, corporate ratings services, and company filings and releases.

Investing Involves Risk

Investing in securities always involves the risk that you will lose money. Before investing in the securities markets, clients should be prepared to bear that risk. Over time, a client's account value will fluctuate. At any time, your assets may be worth more or less than the amount you invested. Blue Marble makes no guarantees or promises that our market analysis will be accurate or the investment strategies we use will be successful.

Clients investing in an EarthFolio account will have a model portfolio recommended to them based on their investment profile as determined by an interactive web-based questionnaire. Clients may decide to invest in portfolio different than the one recommended; however, clients should understand that if they choose a model that was not recommended, the model may not be as appropriate for the client (may have higher risk or lower return potential) as the model recommended, based on the client's time horizon and risk tolerance.

Specific Security Risks

General Risks of Owning Securities

The prices of securities held in client accounts and the income they generate may decline in response to certain events taking place around the world. These include events directly involving the issuers of securities held as underlying assets of funds in a client's account, conditions affecting the general economy, and overall market changes. Other contributing factors include local, regional, or global political, social, or economic instability and governmental or governmental agency responses to economic conditions. Finally, currency, interest rate, and commodity price fluctuations may also affect security prices and income.

Mutual Funds (Open-End Investment Company)

A mutual fund is a company that pools money from many investors and invests the money in stocks, bonds, short-term money-market instruments, other securities or assets, or some combination of these investments. The portfolio of the fund consists of the combined holdings it owns. Each share represents an investor's proportionate ownership of the fund's holdings and the income those holdings generate. The price that investors pay for mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads). All mutual funds within EarthFolio accounts are purchased at NAV, with sales loads waived.

Mutual funds have benefits such as professional management, diversification, affordability, and liquidity. However, they also have features that some investors might view as disadvantages:

Costs Despite Negative Returns

Investors must pay management costs and internal fund expenses regardless of how the fund performs. Depending on the timing of their investment, investors may also have to pay taxes on any capital gains distribution they receive. This includes instances where the fund went on to perform poorly after purchasing shares.

Lack of Control

Investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

Price Uncertainty

With an individual stock, investors can obtain real-time (or close to real-time) pricing information with relative ease by checking financial websites or by calling a broker or your investment adviser. Investors can also monitor how a stock's price changes from hour to hour or even second to second. By contrast, with a mutual fund, the price at which an investor purchases or redeems shares will typically depend on the fund's NAV, which the fund might not calculate until many hours after the investor placed the order. In general, mutual funds must calculate their NAV at least once every business day, typically after the major U.S. exchanges close.

Different Types of Funds

When it comes to investing in mutual funds, investors have literally thousands of choices. Most mutual funds fall into one of three main categories; money market funds, bond funds (also called "fixed income" funds), and stock funds (also called "equity" funds). Each type has different features and different risks and rewards. Generally, the higher the potential return, the higher the risk of loss.

Money Market Funds

Money market funds have relatively low risks, compared to other mutual funds (and most other investments). By law, they can invest in only certain high quality, short-term investments issued by the U.S. Government, U.S. and foreign corporations, state and local governments, and bank issued certificates of deposit. Money market funds try to keep their net asset value (NAV), which represents the value of one share in a fund, at a stable \$1.00 per share. However, the NAV may fall below \$1.00 if the fund's investments perform poorly. Investor losses have been rare, but they are possible. Money market funds pay dividends that generally reflect short-term interest rates, and historically the returns for money market funds have been lower than for either bond or stock funds.

That is why “inflation risk,” the risk that inflation will outpace and erode investment returns over time, can be a potential concern for investors in money market funds.

Stock Funds

Although a stock fund's value can rise and fall quickly (and dramatically) over the short term, historically stocks have performed better over the long term than other types of investments. This is true for corporate bonds, government bonds, and treasury securities. Overall "market risk" poses the greatest potential danger for investors in stock funds. Stock prices can fluctuate for a broad range of reasons- such as the overall strength of the economy or demand for particular products or services. Not all stock funds are the same. For example:

Growth Funds

Growth funds focus on stocks that may or may not pay a regular dividend but have the potential for large capital gains. These funds favor companies expected to grow earnings, which could result in stock prices rising faster than the economy and may be smaller and less seasoned companies. The smaller and less seasoned companies that may be in a growth fund have a greater risk of price volatility. Growth stocks, which can be priced on future expectations rather than current results, may decline substantially when expectations are not met or general market conditions weaken.

Equity Income Funds

Equity income funds stress current income over growth and may invest in stocks that pay regular dividends. These funds are subject to dividend payout risk, which is the possibility that a number of the companies in which the fund invests will reduce or eliminate the dividend on the securities held by the fund.

Small Cap Funds

Funds that invest in stocks of small companies involve additional risks. Smaller companies typically have higher risk of failure and are not as established as larger blue-chip companies. Historically, smaller- company stocks have experienced a greater degree of market volatility than the overall market average.

Mid Cap Funds

Funds that invest in companies with mid-range market capitalizations involve additional risks. The securities of these companies may be more volatile and less liquid than the securities of larger companies.

Index Funds

Index funds aim to achieve the same return as a particular market index, such as the S&P 500 Composite Stock Price Index or the Calvert U.S. Large Cap Core Index, by investing in all-or perhaps a representative sample-of the companies included in an index.

International Funds

International investments are subject to additional risks, including currency fluctuation, political instability, and potential illiquid markets.

Emerging Market Funds

Funds that invest in foreign securities of smaller, less-developed countries involve special additional risks. These risks include, but are not limited to currency risk, political risk and risk associated with varying accounting standards. Investing in emerging markets may accentuate these risks.

Sector Funds

Sector funds may specialize in a particular industry segment, such as technology or consumer products stocks. Funds that invest exclusively in one sector or industry involve additional risks. The lack of industry diversification subjects the investor to increased industry-specific risk.

Bond Funds

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields. Unlike money market funds, the SEC's rules do not restrict bond funds to high quality or short-term investments. Because there are many different types of bonds, bond funds can vary dramatically in their risks and rewards. Some of the risks associated with bond funds include:

Credit Risk

There is a possibility that companies or other issuers may fail to pay their debts (including the debt owed to holders of their bonds). Consequently, this affects mutual funds that hold these bonds. Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury Bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.

Interest Rate Risk

There is a risk that the market value of the bonds will go down when interest rates go up. Because of this, investors can lose money in any bond fund, including those that invest only in insured bonds or U.S. Treasury Bonds. Funds that invest in longer-term bonds tend to have higher interest rate risk.

Prepayment Risk

Issuers may choose to pay off debt earlier than the stated maturity date on a bond. For example, if interest rates fall, a bond issuer may decide to "retire" its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

TIPS Funds

Treasury Inflation Protected Securities (TIPS) are inflation-indexed securities structured to remove inflation risk. TIPS are indexed to an inflationary gauge to protect investors from the decline in the purchasing power of their money. The value of TIPS will increase with inflation but will decrease with deflation.

Exchange-Traded Funds (ETFs)

ETF is a type of Investment Company (usually, an open-end fund or unit investment trust) containing a basket of stocks. Typically, the objective of an indexed ETF is to achieve returns similar to a particular market index, including sector indexes.

An ETF is similar to an index fund in that it will primarily invest in securities of companies that are included in a selected market. Unlike traditional mutual funds, which can only be redeemed at the end of a trading day, ETFs trade throughout the day on an exchange. Like stock mutual funds, the prices of the underlying securities and the overall market may affect ETF prices.

Similarly, factors affecting a particular industry segment may affect ETF prices that track that particular sector. An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Because ETFs use "authorized participants" (APs) as agents to facilitate creations or redemptions (primary market), there is a risk that an AP decides to no longer participate for a particular ETF; however, that risk is mitigated by the fact that other APs can step in to fill the vacancy of the withdrawing AP [an ETF typically has multiple APs] and ETF transactions predominantly take place in the secondary market without need for an AP. Like other liquid securities, ETF pricing changes throughout the trading day and there can be no guarantee that an ETF is purchased at the optimal time in terms of market movements. Moreover, due to market fluctuations, ETF brokerage costs, differing demand and characteristics of underlying securities, and other factors, the price of an ETF can be lower than the aggregate market price of its cash and component individual securities (net asset value - NAV). An ETF is subject to the same market risks as those of its underlying individual securities, and also has internal expenses that can lower investment returns.

Tax Consequences of Mutual Funds

When investors buy and hold an individual stock or bond, the investor must pay income tax each year on the dividends or interest the investor receives. However, the investor will not have to pay any capital gains tax until the investor actually sells and makes a profit. Mutual funds are different. When an investor buys and holds mutual fund shares, the investor will owe income tax on any ordinary dividends in the year the investor receives or reinvests them. Moreover, in addition to owing taxes on any personal capital gains when the investor sells shares, the investor may have to pay taxes each year on the fund's capital gains. That is because the law requires mutual funds to distribute capital gains to shareholders if they sell securities for a profit that cannot be offset by a loss.

Brokered CDs

CDs brokered by Schwab offer some of the same benefits as bank CDs. They are steady and predictable, offer FDIC insurance, have a broad selection of maturity dates, and can be held in a variety of investment accounts. Brokered CDs can also make it easier to build CD ladders. Risks associated with brokered CDs:

Market risk

The most common risk is that you'll need your funds before the CD matures. Although there are no early redemption fees (like there are for bank-issued CDs), you may receive less than your original purchase price.

Call risk

Brokered CDs may have call features that give the issuing bank the right, after a set period of time, to redeem or "call" the brokered CD before its maturity date. The risk is that the issuer will exercise a call option at an unfavorable time for the holder, such as when interest rates decline.

Cash and Cash Equivalents

Cash and cash equivalents are the most liquid of investments. Cash and cash equivalents are considered very low-risk investments meaning, there is little risk of losing the principal investment. Typically, low risk also means low return and the interest an investor can earn on this type of investment is low relative to other types of investing vehicles.

ITEM 9 - DISCIPLINARY INFORMATION

Blue Marble and our personnel seek to maintain the highest level of business professionalism, integrity, and ethics. Blue Marble does not have any disciplinary information to disclose.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Arturo Tabuenca, Blue Marble's Portfolio Manager, is also a licensed insurance agent and a registered securities representative of Purshe Kaplan Sterling Investments ("PKS"), a non-affiliated registered broker-dealer and a member of the Financial Industry Regulation Authority ("FINRA"). Mr. Tabuenca's activities with PKS represent less than 5% of his time and are generally only conducted upon client request or for products outside the scope of Blue Marble's socially responsible objective. A conflict of interest exists to the extent that Mr. Tabuenca receives commissions and/or trailing service fees related to the sale of commissionable products, as this practice gives him an incentive to recommend products based on the compensation received, rather than on the client's needs. Therefore, clients are advised that the client is under no obligation to act on these recommendations or purchase commissionable products through Mr. Tabuenca as a registered representative. In all cases, insurance commissions will be fully disclosed to the client. Commissions from these products are separate from any fees that Blue Marble receives for advisory services. Clients have the right to utilize or decline to utilize the services of any representative of Blue Marble in their outside capacity and have the right to purchase services or products recommended by Blue Marble through another provider.

Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Marble always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Blue Marble in such individual's outside capacity.

Sierra Smith is a licensed insurance agent and registered representative with Purshe Kaplan Sterling Investments (PKS). From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Marble always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Blue Marble in such individual's outside capacity.

Blue Marble's other portfolio managers may also be associated with unaffiliated firms in the financial industry. Please see the Form ADV Part 2B Brochure Supplement of each portfolio manager for a description of other business activities they engage in, the compensation they receive, and any related conflicts of interest.

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

Code of Ethics

Blue Marble believes that we owe clients the highest level of trust and fair dealing. As part of our fiduciary duty, we place the interests of our clients ahead of the interests of the firm and our personnel. Blue Marble and its personnel do not have a material financial interest in recommendations made to client accounts. We have adopted a Code of Ethics that emphasizes the high standards of conduct that Blue Marble seeks to observe. Blue Marble's personnel are required to conduct themselves with integrity at all times and follow the principles and policies detailed in our Code of Ethics.

Blue Marble's Code of Ethics attempts to address specific conflicts of interest that either we have identified or that could likely arise. Our personnel are required to follow clear guidelines from the Code of Ethics in areas such as gifts and entertainment, other business activities, prohibitions of insider trading, and adherence to applicable state and federal securities laws. Blue Marble will provide a complete copy of the Code of Ethics to any client or prospective client upon request.

Personal Trading Practices

Individuals who formulate investment advice for clients, or who have access to nonpublic information regarding any clients' purchase or sale of securities, are subject to Blue Marble's personal trading policies. Blue Marble and our personnel may purchase or sell securities for ourselves that we also recommend to clients. This includes related securities (e.g., warrants, options, or futures). This presents a conflict of interest as we have an incentive to favor our personal trades over client transactions or use the information about the transactions we intend to make for clients to our personal benefit. Our policies to address these conflicts include the following:

1. As a fiduciary to our clients, we have a duty to put our clients' interests first. Our fiduciary duty includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.
2. Clients receive the opportunity to act on investment recommendations prior to and in preference to accounts of Blue Marble and our personnel.
3. Blue Marble prohibits trading in a manner that takes personal advantage of our knowledge of client transactions or price movements caused by client transactions.
4. At times, we might wish to trade in the same security that we plan to trade for a client. For non-exchange-traded mutual funds, if we traded on the same day as clients, we would receive the same price, since mutual funds are issued and redeemed once daily at the fund's net asset value ("NAV"). For stocks or other securities where the prices fluctuate during the day, we will place our own transactions after we place client trades. Since prices fluctuate, this does not guarantee that clients will get better prices than our personnel. The personal trading of our affiliates will not be permitted to front run or disadvantage trading for clients.
5. Blue Marble maintains required personal securities transaction records

ITEM 12 - BROKERAGE PRACTICES

All Blue Marble client accounts are held at an independent qualified custodian. Blue Marble requires clients to open an account with Charles Schwab & Co., Inc. Advisor Services. The client will enter into a separate agreement with Charles Schwab & Co. to custody the assets. Blue Marble is independently owned and operated and is not affiliated with Charles Schwab & Co. By requiring clients to use Charles Schwab & Co., Blue Marble believes we may be able to manage the client's portfolio, achieve favorable execution of client transactions, and overall lower the costs to the

portfolio more effectively. Clients may not direct Blue Marble to place trades through any outside brokers. Not all investment advisers require their clients to trade through specific brokerage firms.

Factors Considered in Selecting Broker-Dealers for Client Transactions

Research and Other Benefits

Charles Schwab & Co., Inc. Advisor Services (Schwab) provides Blue Marble with access to Schwab's institutional trading and custody services, which are typically not available to Schwab's retail investors. Schwab includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to investors or would require a significantly higher minimum initial investment. For Blue Marble client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Blue Marble other products and services that benefit Blue Marble but may not benefit its clients' accounts. These benefits may include national, regional or Blue Marble specific educational events organized and/or sponsored by Schwab. Other potential benefits may include occasional business entertainment of personnel of Blue Marble by Schwab personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Blue Marble in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Blue Marble's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping, and client reporting. Many of these services generally may be used to service all or some substantial number of Blue Marble's accounts.

Schwab also makes available to Blue Marble other services intended to help Blue Marble manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance, and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Blue Marble by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Blue Marble. Blue Marble is independently owned and operated and not affiliated with Schwab.

Aggregation and Allocation of Transactions

In most cases, Blue Marble primarily buys and sells open-end mutual funds. However, in certain cases, Blue Marble may purchase individual stocks that are particularly strong in addressing an environmental or social issue, or in cases when a client prefers to be an individual equity shareholder. It is important to note that in most of these cases, the individual stock positions are modest relative to the overall client portfolio and are intended as long-term investments. In those cases, we may aggregate the orders for clients that are in the same securities if we believe that aggregation is in the best interests of our clients.

Blue Marble has adopted certain policies and procedures that we follow when aggregating trades, in an effort to provide an objective and equitable method of trade allocation so that all clients are treated fairly. The basic objectives of our policies and procedures are as follows:

1. Blue Marble will not aggregate trades unless we believe that aggregation is consistent with our duty to seek best execution for clients.
2. Blue Marble does not aggregate trades of our personnel with those of client accounts.
3. No client account will be favored over any other client account.
4. Each account that participates in an aggregated transaction will participate at the average of the executed share price for that transaction.
5. Blue Marble will allocate each transaction in writing prior to the time an order is transmitted to a broker for execution.
6. If the aggregated transaction is filled in its entirety, it will be allocated among the accounts listed on the pre-allocation order. If an allocation is only partially filled, it will be allocated on a pro rata basis. However, if a pro rata allocation results in a de minimis amount to one or more of the accounts, Blue Marble may deviate from the pro rata allocation and document the reasons for the deviation.

Blue Marble believes that by combining orders in this way it will be advantageous to all participants. However, the average price could be less advantageous to a particular client than if that client had been the only account executing the transaction or had completed its transaction before the other participants.

ITEM 13 - REVIEW OF ACCOUNTS

Managed Account Reviews

Accounts are reviewed at least quarterly by the portfolio manager to determine their conformity with client investment objectives, guidelines, and Blue Marble's investment strategy. The review process is based on a variety of factors, which include but are not limited to: each model's investment strategy, a client's stated investment objectives, the economic environment, outlook for the securities markets and the merits of the securities and/or mutual funds in which the accounts are invested. Each client account will be reviewed at least annually with the client. In addition, a special review of an account may be triggered by one or more of the following: 1) a change in the client's investment objectives, guidelines and/or financial situation communicated by the client, 2) change in diversification, 3) tax considerations, 4) cash added or withdrawn from account, and 5) purchase or sale of a security or mutual fund in the account.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Support Products and Services

We receive an economic benefit from Charles Schwab & Co. in the form of the support products and services they make available to us and other independent investment advisers whose clients maintain their accounts at Charles Schwab & Co. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices). We do not base particular investment advice, such as buying particular securities for our clients, on the availability of Charles Schwab & Co.'s products and services to us. Other than the benefits from Charles Schwab & Co. discussed immediately above, we do not receive any compensation from third parties for advisory services we provide to clients, and we do not pay any third party for referrals.

ITEM 15 - CUSTODY

Blue Marble does not accept or maintain physical custody of client funds or securities. Blue Marble does not permit arrangements that authorize it to withdraw client funds or securities maintained with a qualified custodian under a standing letter of authorization ("SLOA"), nor does Blue Marble permit first-person transfers between a client's own accounts without client authorization.

Clients' funds and securities are held by Charles Schwab, an independent qualified custodian. For the convenience of the client, Blue Marble is authorized to deduct advisory fees directly from client accounts held at the qualified custodian. In such cases, Blue Marble is deemed to have limited custody of client assets.

Blue Marble is not required to undergo an annual surprise custody examination provided that all of the following conditions are met:

1. Client assets are maintained with a qualified custodian;
2. The qualified custodian sends account statements directly to clients at least quarterly, which reflect all transactions, including the deduction of advisory fees;
3. Clients provide written authorization permitting the deduction of advisory fees in accordance with the advisory agreement; and
4. Advisory fees are calculated in accordance with the fee schedule described in Item 5, and clients are able to verify the fees charged by reviewing custodian statements, the advisory agreement, and the fee schedule and calculation methodology described in Item 5.

Clients are encouraged to carefully review statements received from the qualified custodian and to contact Blue Marble with any questions regarding advisory fees or account activity.

ITEM 16 - INVESTMENT DISCRETION

Blue Marble requires full discretion to decide the specific security to trade and to determine the quantity and the timing of transactions for client accounts. Blue Marble is not required to contact clients before placing trades in their account, but clients will receive confirmations directly from the broker for any trades placed. Clients grant us discretionary authority in the contracts they sign with us. Clients also give us trading authority within their accounts when they sign the custodian paperwork.

Certain client-imposed conditions may limit our discretionary authority, such as where the client prohibits transactions in specific security types. See also Tailored Services and Client Imposed Restrictions under **Item 4**, above.

ITEM 17 - VOTING CLIENT SECURITIES

Proxy Voting

Blue Marble does not accept or have the authority to vote client securities. In the rare event that a proxy is issued, clients may call us if they have questions about a particular solicitation. Blue Marble will not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent.

Class Actions

Blue Marble does not instruct or give advice to clients on whether to participate as a member of class action lawsuits and will not automatically file claims on the client's behalf. However, if a client notifies us that they wish to participate in a class action, we will provide the client with transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

ITEM 18 - FINANCIAL INFORMATION

Registered investment advisers are required in this item to provide clients with certain financial information or disclosures about the firm's financial condition. Blue Marble does not foresee any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Blue Marble Investments has never had a bankruptcy petition.

Form ADV, Part 2B Brochure Supplement

Arturo Tabuenca
CRD # 2134379

Blue Marble Investments, LLC

1117 State Street Ste 85
Santa Barbara, CA 93131
805.595.1820

May 6, 2026

This brochure supplement provides information about Arturo Tabuenca that supplements the Blue Marble Investments, LLC brochure. You should have already received a copy of that brochure. Please contact us at 805.595.1820 if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about Arturo Tabuenca is available on the SEC's website at www.adviserinfo.sec.gov.

ARTURO A. TABUENCA
CRD # 2134379

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Arturo A. Tabuenca, Managing Member and Portfolio Manager, b. 1968

Education:

B.A. in Business Administration; Loma Linda University, Riverside, CA; 1991

Business Background:

2000 to present	Blue Marble Investments, LLC ("Blue Marble") Managing Member and Investment adviser Representative (from 2000-2007 Blue Marble held IAR registration with the SEC through Commonwealth Financial Network)
2015 to present	Purshe Kaplan Sterling Investments; Registered Representative
2007 to 2014	Sorrento Pacific Financial, LLC, formerly Partnervest Advisory Services, LLC; Registered Representative
2000 to 2007	Commonwealth Financial Network; Registered Representative
1993 to 2000	Banc of America Investment Services (AKA BA Investment Services, Inc.); Vice President; Financial Advisor
1991 to 1993	Great American Securities; Registered Representative

ITEM 3 - DISCIPLINARY INFORMATION

Arturo Tabuenca has no disciplinary history to disclose.

ITEM 4 - OTHER BUSINESS ACTIVITIES

In addition to the investment advisory services he provides through Blue Marble, Arturo Tabuenca, Blue Marble's Portfolio Manager, is also a licensed insurance agent and a registered securities representative of Purshe Kaplan Sterling Investments ("PKS"), a non-affiliated registered broker-dealer and a member of the Financial Industry Regulation Authority ("FINRA"). Mr. Tabuenca's activities with PKS represent less than 5% of his time and are generally only conducted upon client request or for products outside the scope of Blue Marble's socially responsible objective. A conflict of interest exists to the extent that Mr. Tabuenca receives commissions and/or trailing service fees related to the sale of commissionable products, as this practice gives him an incentive to recommend products based on the compensation received, rather than on the client's needs. Therefore, clients are advised that the client is under no obligation to act on these recommendations or purchase commissionable products through Mr. Tabuenca as a registered representative. In all cases, insurance commissions will be fully disclosed to the client. Commissions from these products are separate from any fees that Blue Marble receives for

advisory services. Clients have the right to utilize or decline to utilize the services of any representative of Blue Marble in their outside capacity and have the right to purchase services or products recommended by Blue Marble through another provider.

ITEM 5 - ADDITIONAL COMPENSATION

Arturo Tabuenca's compensation comes from his regular income and ownership of Blue Marble and from his other business activities described in Item 4 above.

ITEM 6 - SUPERVISION

Arturo Tabuenca is the Managing Member of Blue Marble and is supervised by Linda Shelby, the firm's Chief Compliance Officer. Linda Shelby is responsible for ensuring that Arturo Tabuenca adheres to all required regulations regarding the activities of an investment adviser representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Linda Shelby is (805) 595-1820.

Form ADV, Part 2B Brochure Supplement

Linda Shelby

**1117 State Street Ste 85
Santa Barbara, CA 93131
805.595.1820**

May 6, 2026

This brochure supplement provides information about Linda Shelby that supplements the Blue Marble Investments, LLC brochure. You should have already received a copy of that brochure. Please contact us at 805.595.1820 if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about Linda Shelby is available on the SEC's website at www.adviserinfo.sec.gov.

LINDA SMITH SHELBY
CRD# 1286574

ITEM 2- EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Linda S. Shelby, Chief Administrative Officer and Chief Compliance Officer, b. 1960

Education:

B.S. in Business Administration/Finance; California State University, Fresno, CA; 1983

Business Background:

2017 to present	Blue Marble Investments, LLC; Compliance Officer; Chief Administrative Officer
1990 to 2016	Bank of America/Merrill Lynch; Senior Vice President; West Division Executive Registered Representative and IAR; (Prior to merger with ML, Bank of America investment firms operated under names: Banc of America Investment Services, Inc., BA Investment Services, Inc., Investment Network of America - Great Northern Annuity
1989 to 1990	First Imperial Investments; Financial Advisor-Registered Representative
1987 to 1989	Merrill Lynch; Financial Advisor-Registered Representative,
1984 to 1987	Dean Witter Reynolds (Morgan Stanley); Financial Advisor-Registered Representative

ITEM 3 - DISCIPLINARY INFORMATION

Linda Shelby has no disciplinary history to disclose.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Linda Shelby is not actively engaged in any other business or occupation that creates a material conflict of interest.

ITEM 5 - ADDITIONAL COMPENSATION

Linda Shelby does not receive additional compensation that creates a material conflict of interest.

ITEM 6 - SUPERVISION

Arturo Tabuenca is the Managing Member of Blue Marble and supervises the investment activities performed by Linda Shelby. Arturo Tabuenca is responsible for ensuring that Linda Shelby adheres to all required regulations regarding the activities of an investment adviser representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. Arturo Tabuenca can be reached at 805-595-1820.

Form ADV, Part 2B Brochure Supplement

Sierra Smith

CRD# 7373331

Blue Marble Investments, LLC

**1117 State Street Ste 85
Santa Barbara, CA 93131
805.595.1820**

May 6, 2026

This brochure supplement provides information about Sierra Smith that supplements the Blue Marble Investments, LLC brochure. You should have already received a copy of that brochure. Please contact us at 805.595.1820 if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about Sierra Smith is available on the SEC's website at www.adviserinfo.sec.gov.

SIERRA KATHRYN SMITH
CRD# 7373331

ITEM 2- EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Sierra Smith, Investment Adviser Representative, b. 1998

Education:

Bachelor of Arts Sociology; California Polytechnic State University, San Luis Obispo, CA; 2021

Business Background:

10/2021 to Present

Blue Marble Investments, LLC; Investment Adviser Representative

04/2021 to 10/2021

Blue Marble Investments LLC; Associate

09/2017 to 06/2021

California Polytechnic State University; Student

Professional Designations:

Certified Financial Planner (CFP®) professional

Sierra Smith is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.

Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations. Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

Ethics – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3 - DISCIPLINARY INFORMATION

Sierra Smith has no disciplinary history to disclose.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Sierra Smith is a registered representative of Purshe Kaplan Sterling Investments (“PKS”). From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Blue Marble always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Blue Marble in such individual's outside capacity.

Sierra Smith is a licensed insurance agent. From time to time, she will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Blue Marble always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether to utilize the services of any representative of Blue Marble in such individual's outside capacities.

ITEM 5 - ADDITIONAL COMPENSATION

Sierra Smith does not receive additional compensation that creates a material conflict of interest.

ITEM 6 - SUPERVISION

As a representative of Blue Marble Investments, LLC, Sierra Smith is supervised by Linda Shelby, the firm's Chief Compliance Officer. Linda Shelby is responsible for ensuring that Sierra Smith adheres to all required regulations regarding the activities of an investment adviser representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Linda Shelby is (805) 595-1820.