SAPPHIRE BLUE INVESTMENT PARTNERS March 28, 2023

Item 1. Introduction.

Sapphire Blue Investment Partners is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers and investing.

Questions to Ask Us:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose the investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Item 2: What investment services and advice can you provide to me?

Sapphire Blue Investment Partners provides investment advisory services to retail investors. The principal services we offer are portfolio management, consulting services for retirement plans, and selection of other advisers. Depending upon the client profile and investment management services program selected, we may provide investment management services on a wrap fee program basis. We tailor your investment management services to match the investment objectives, and financial needs you provide to us. We monitor the holdings and performance of your account on an ongoing basis and may provide you with periodic reports regarding the performance and holdings of your account. We provide investment management services on a discretionary basis pursuant to authority granted to us in your client agreement. Pursuant to this discretionary authority we are authorized to determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which transactions will be effected. However, there are certain clients for which we provide investment management services on a non-discretionary basis, meaning the client makes the ultimate decisions regarding the purchase or sale of investments. We generally do not limit the types of investments we utilize for clients, but consistently utilize unit investment trusts and individual equity securities and to a lesser degree, exchange traded funds, mutual funds, digital assets, and fixed income securities. We do not impose account minimums for new clients. Regardless, we reserve the right to accept or decline a potential client for any reason in our sole discretion. For additional information, please click *here* to refer to our **Form ADV Part 2A Brochure**, especially Item 4 Advisory Business and Item 7 Types of Clients and Item 5 Fees and Compensation and for our Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure, Item 4 Services, Fees, and Compensation.

Question to Ask Us:

Help me to understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go tofees and costs, and how much will be invested for me?

Item 3 (part 1): What fees will I pay?

For investment advisory services we charge either an asset-based fee (non-wrap accounts) or an asset-based wrap program fee (wrap accounts), which are billed in advance on a quarterly basis. All of our fees are negotiable and based on a "complexity" formula for your portfolio or financial situation. For asset-based fees we typically charge a fixed annual fee of 2.5% for non-wrap accounts and 3.0% for wrap accounts of your total assets we manage. For our selection of other advisers services our fees may differ depending upon the arrangement we have with each third-party money manager. These fees can be either a (1) a shared fee, or (2) separate and apart fees. For our consulting services involving retirement plans we charge a fixed fee, which generally ranges from \$250 to 5,000, all due in advance at the time of signing our written agreement and rendered within 30-days. For an asset-based fee, the more assets that are in a client's advisory account, the more a client will pay in fees. Therefore, we have an incentive to encourage clients to increase the assets in his or her account. Asset-based wrap program fees will include most transaction costs and fees to a broker-dealer or bank that has custody of the client's assets, and therefore are often higher than a typical asset-based advisory fee.

In addition to our fees you will be responsible for other fees and expenses, such as, transaction charges and fees/expenses charged by any custodian of your account, subadvisor, mutual fund, exchange traded fund, separate account manager and any taxes or fees required by federal or state law. When providing investment

management services pursuant to an asset-based wrap program fee you, will be responsible for other fees and

expenses, such as fees/expenses charged by any subadvisor, mutual fund, exchange traded fund, separate account manager and any taxes or fees required by federal or state law, as well as commission and transaction fees for any transactions executed away from the program broker-dealer.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information, please click here to refer to our Form ADV Part 2A

Brochure, Item 5 Fees and Compensation and for our Form ADV Part 2A Appendix 1 Wrap Fee Program

Brochure, Item 4 Services, Fees, and Compensation.

Question to Ask Us:

How might your conflicts of interest affect me, and how will you address them?

Item 3 (part 2): What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. As an example, we receive various benefits and services from custodians that we may recommend to you. For additional information, please click here to refer to our Form ADV Part 2A Brochure, specifically Item 12 Brokerage Practices, Item 14 Client Referrals and Other Compensation and for our Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure, Item 9 Additional Information.

Item 3 (part 3): How do your financial professionals make money?

Our financial professionals are paid a percentage of the revenue earned by the firm on the client assets managed and/or serviced by the specific financial professional. Certain of our financial professionals serve as registered representatives of an unaffiliated broker-dealer, as well as licensed insurance agents. These financial professionals earn commissions and other fees on products sold through the unaffiliated broker-dealer and as licensed insurance agents. While no commissions are earned by these financial professionals relative to any of our client investment advisory services accounts, this presents a conflict of interest because these financial professionals in their role as registered representatives and licensed insurance agents are incentivized to make recommendations based on the compensation received rather than on a client's needs. For additional information regarding our financial professionals' activities as registered representatives and as insurance agents please click here to refer to our Form ADV Part 2A Brochure, specifically Item 10 Other Financial Industry Activities and Affiliations for our Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure, Item 9 Additional Information.

Questions to Ask Us:

As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 4: Do you or your financial professionals have a legal of disciplinary history?

Yes. You can visit <u>Investor.gov/CRS</u> for a free and simple search tool to research our firm and our financial professionals.

Questions to Ask Us:

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?

Who can I talk to if Ihave concerns about how a person is treating me?

Item 5: Additional Information.

For additional information about our Firm please click <u>here</u> to refer to our **Form ADV Brochure** and/or to request hard copies, please contact us at 810-714-9456.