



## **Swell Investing LLC**

### **Form ADV Part 2A: Appendix 1 Wrap Fee Program Brochure & Brochure Supplement**

Pursuant to Part 2A & 2B of Form ADV

March 29, 2019

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[swellinvesting.com](http://swellinvesting.com)

This wrap fee program brochure (the “Brochure”) provides information about the qualifications and business practices of Swell Investing, LLC (the “Firm” or “Swell”). If you have any questions about the contents of this brochure, please contact us at 949-566-8985 or email [support@swellinvesting.com](mailto:support@swellinvesting.com). 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.

Additional information about Swell is also available on the SEC’s website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

SEC registration of an investment adviser does not imply a certain level of skill or training.

**Item 2: Material Changes**

This section discusses only material changes since the last annual update of this Brochure. This Brochure was previously updated on August 15, 2018.

Items 4, 6, 9, and Part 2B have had material updates since the last annual update of this Brochure.

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#### **Item 4: Services, Fees and Compensation**

##### Program Description

Swell offers the Swell Investment Management Program (“SIMP”), an online portfolio management platform for the socially-minded individual that desires to invest in companies that are cause-driven. Swell’s investment platform focuses on Sustainable Responsible Investing (“SRI”) with the intended goal of delivering meaningful returns and impact to our clients by making it easy to invest in purpose-driven companies that are changing the world for the better.

Our online services begin by having the client respond to a series of questions designed to identify the client’s investment objectives and tolerance for risk, and determine whether Swell’s investment products are suitable for them. The responses to the questionnaire are the sole basis upon which this determination is made. For clients whose investment objectives are compatible with Swell’s products, we then offer a selection of several investment portfolios comprised of socially conscious companies whose values are consistent with the client’s values-leaning life and consumer choices. Swell offers the Impact 400 portfolio, which is comprised of approximately 400 impactful public companies that derive revenue from activities aligned with the 17 United Nations Sustainable Development Goals, and also offers six portfolios focused on the following specific themes: clean water, disease eradication, green tech, renewable energy, healthy living and zero waste. The Impact 400 is not a formal market index and is not intended to be representative of the performance of the U.S. stock market or any particular segment thereof. Our investment management services are currently limited to these portfolios, but additional portfolios may be added in the future.

Swell provides ongoing and continuous investment management services on a discretionary basis only. The investment advice Swell provides is not tailored to the individual needs of the client and clients may not place restrictions on their investment portfolio. During or after the account opening process, however, clients may remove up to three companies from their current portfolio mix. Clients who communicate these restrictions after the selection of their initial investments may have such restricted securities included in their initial portfolio mixes. In these cases, Swell will liquidate the client’s positions in restricted securities as soon as practicable following the receipt of the client’s instructions.

##### Fees and Compensation

Swell offers SIMP as a wrap fee program. Typically, a wrap fee program provides a bundle of investment services, including asset allocation, portfolio management, custody of client funds and securities, execution of client transactions, and monitoring of portfolio performance for a single “wrap” fee, generally a percentage of assets under management. The wrap fee client is not charged brokerage commissions on a transactional basis. On the other hand there are programs that do not charge a wrap fee. When evaluating a wrap fee arrangement, clients should consider whether a wrap fee or a non-wrap fee arrangement is more suitable. The fees may be higher under a wrap fee arrangement versus a non-wrap fee arrangement.

Swell is compensated by charging an annual fee of 0.75% based on the net market value of the client’s account. The fee is charged monthly, in arrears, and is automatically deducted from the client’s custodial account. Swell reserves the right, in its sole discretion, to reduce or waive the advisory fee for certain client accounts for any period of time determined by Swell.

The fee charged to clients covers expenses for investment management services, custody of assets, trading commissions, and clearing of transactions and account reporting. This fee does not, however, cover certain fees and foreign taxes that are incurred on client investments in American depositary receipts. Swell, and not the client, is responsible for compensating Folio Institutional Inc., (“Folio”) the program’s custodian and executing broker-dealer. So long as Swell’s assets under management are below \$150,000,000, Swell pays Folio a monthly fee of \$22,500 for custodial services. The fee converts to an asset based fee of 0.10% after the \$150,000,000 assets under management threshold is exceeded. The asset based fee reduces further to 0.08% when Swell’s assets under management exceed \$1,000,000,000. Swell also pays Folio a monthly fee of \$2 per new client account opened during the prior month. Folio provides a number of services to Swell in exchange for these fees, including but not limited to maintaining custody of client assets, operating a due diligence program for new client accounts, executing and settling Swell clients’ securities transactions, and maintaining certain books and records pertaining to client accounts and transactions. Swell, and not the client, is also responsible for paying Swell’s affiliate, Cadence Capital Management LLC (“Cadence”), an annual fee of 0.10% for support services that include advising Swell on the weighting of securities positions and the monitoring of investment risk in client portfolios.

Swell retains whatever fees remain after it pays the aforementioned fees to Folio and Cadence. If a client contributes funds to their account on a date other than the first day of the month, then a prorated fee will be charged for that month with respect to such contribution based on the number of days remaining in that month. If a client withdraws assets on any date other than the last day of the month then a prorated fee will be charged based on the number of days in the month that the funds remained in the portfolio(s) prior to the withdrawal.

In the event a client wants to terminate our services, a pro-rated amount of the fee will be charged to the client’s account based on the number of days that the funds remained in the portfolio(s) prior to the termination. The client must provide notice of termination as outlined in the advisory agreement. Upon receipt of such notice, Swell will proceed to close out the client’s account.

#### Platforms

Swell may provide investment management and investment advisory services through a partnership with Platform providers and their contracted independent investment advisors through various managed account programs. Swell has no affiliations with these Platform providers.

#### **Item 5: Account Requirements and Types of Clients**

Swell’s intended clients are individuals with taxable accounts and/or Individual Retirement Accounts. The minimum investment to get started at Swell is \$50. Swell reserves the right, in its sole discretion, to reduce or waive the minimum investment amount for certain client accounts. All client accounts are opened and maintained according to an advisory agreement between the client and Swell.

#### **Item 6: Portfolio Manager Selection and Evaluation**

Swell is the sponsor and portfolio manager for SIMP and manages the investment portfolios of clients directly in accordance with each client's advisory agreement and does not recommend or select other portfolio managers to manage client accounts.

#### Advisory Business

Swell, a Delaware limited liability company, was formed in January 2015, as an indirectly wholly owned subsidiary of Pacific Life Insurance Company ("Pacific Life"). Through its direct and indirect subsidiaries, Pacific Life is engaged in a wide variety of insurance, financial services, and other investment-related businesses.

As of December 31, 2018, Swell managed \$33,029,536 on a discretionary basis.

Please refer to the "Services, Fees and Compensation" section above for a description of the advisory business offered by Swell.

#### Performance-Based Fees and Side-By-Side Management

Performance-based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client. An adviser charging performance fees to some accounts faces a variety of conflicts because the adviser can potentially receive greater fees from its accounts having a performance-based compensation structure than from those accounts it charges a fee unrelated to performance (e.g., an asset-based fee). As a result, an adviser may have an incentive to direct the best investment ideas to, or to allocate or sequence trades in favor of, the account that pays a performance fee. This potential conflict of interest does not exist at Swell because Swell does not charge any clients performance-based fees.

#### Methods of Analysis, Investment Strategies and Risk of Loss

Unlike many online investment advisers, Swell does not use an algorithm to manage its client accounts. Swell's portfolios are managed by our portfolio managers. Swell primarily uses a "rules-based" investment approach that applies a number of objective quantitative criteria to identify the stocks of companies that are making a positive impact toward addressing several socially responsible initiatives, though the Company's portfolio management process does include a "principles-based" component that permits portfolio managers to account for qualitative factors and include or exclude holdings based on emergent controversies and other developments. Our process attempts to identify companies that are generating revenue towards these selected initiatives. Additionally, we screen out those companies that have well below average overall environmental, social and governance (ESG) ratings, which are the three central factors in measuring sustainability and ethical impact of an investment in a company. ESG ratings are provided to Swell by various third-party analysis firms. Finally, we eliminate those companies that have been deemed to not provide a meaningful impact towards our selected SRI themes.

Portfolios are constructed to lower the cost of implementation by liquidity weighting the holdings while at the same time giving preference to those securities that are trading at a discounted valuation as compared to the security's historical valuation as well as avoiding those securities that have experienced outsized recent price strength. For risk control, positions generally will not represent more than 4% of the portfolio at cost. We rebalance the weights of existing portfolio positions semi-annually to improve the risk/return profile and undertake a thorough

analysis annually to consider current and prospective constituent securities for each portfolio and reconstruct such portfolios.

Rebalancing and reconstruction of Swell's portfolios typically result in the execution of a very large volume of securities transactions with Swell's brokerage partner, which may strain their execution and settlement capabilities. Similarly, in selecting or altering the mix of Swell portfolios in their accounts through Swell's website, Clients may initiate the purchase or sale of a large number of securities. Depending on the volume of such transactions, a particular Client's transactions may be broken into tranches and executed in multiple trading windows. In such cases, securities prices may move between trading windows, which could result in Clients receiving better or worse execution prices in subsequent tranches than would have applied if all trades had been executed together. Furthermore, to avoid the execution of large quantities of trades in very small fractional shares, Swell may in its discretion exclude client accounts with small market values at the time a rebalance or reconstruction occurs (e.g., all accounts valued at less than \$10), or trades under a certain value threshold (e.g., all trades under \$1) from participation in such rebalances or reconstructions.

#### Risk of Loss

The description below is an overview of the risks entailed in our investment strategies and is not intended to be complete. All investing involves a risk of loss that clients should be prepared to bear and the investment strategies offered by Swell could lose money over short or long periods. Performance could be hurt by a number of different market risks including but not limited to:

Advisory Risk. There is no guarantee that Swell's judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. Swell's judgment may prove to be incorrect, and a client might not achieve her investment objectives. Swell may also make future changes to the portfolio rule sets and advisory services that it provides. In addition, it is possible that clients or Swell itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to Swell's software based financial advisory service. Swell and its representatives are not responsible to any client for losses unless caused by Swell breaching its fiduciary duty.

Stock Market Risk. Stock market risk is the chance that stock prices overall will decline. An investment in individual securities or in a portfolio of securities could lose money. We cannot give any guarantee that we will achieve the client's investment objectives or that any client will receive a return of their investment. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices.

Individual Equity Risks. Under strategies utilizing equity securities, the portfolios are subject to the risk that stock prices may fall over short or extended periods of time. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. These factors contribute to price volatility, which is the principal risk of investing in equity securities.

Risks Related to Foreign Securities. Swell's strategies primarily invest in equity securities listed directly on US exchanges. Swell may also invest in foreign securities that are purchased in "depository receipt" form (generally "American Depositary Receipts" or "ADRs"). The risk with investing in foreign securities are several: first, legal and regulatory regimes may not be as

rigorous or strictly enforced as in the US; second, ADRs in which Swell invests may have limited quantities available at any given time, so liquidity can be limited; third, information concerning the underlying companies issuing foreign stocks can be more limited than their US counterparts; and fourth, the voting of proxies can be significantly more difficult for foreign securities.

Risks Related to Company Size. Swell's strategies primarily invest in small-capitalization and mid-capitalization stocks, which are often more volatile and less liquid than investments in larger companies. The frequency and volume of trading in securities of smaller and mid-size companies may be substantially less than is typical of larger companies. Therefore, the securities of smaller and mid-size companies may be subject to greater and more abrupt price fluctuations. In addition, smaller and mid-size companies may lack the management experience, financial resources and product diversification of larger companies, making them more susceptible to market pressures and business failure.

Risks Associated with the Underlying Business. Investments in securities entail all the risks associated with the underlying businesses, including reliance on a company's managers and their ability to execute business strategies. In addition, all businesses face risks such as adverse changes in regulatory requirements, interest rate and currency fluctuations, general economic downturns, changes in political situations, market competitions and other factors. Swell will not have day-to-day control over any company in which it invests for clients.

Diversification Risks. Swell's investment portfolios will be concentrated in specific industry groups and will not be considered diversified portfolios. Such industry concentration could have a material effect on the performance of the portfolio if the particular industry sector in which the portfolio is invested does not perform well or falls out of favor. Non-diversified portfolios may experience greater volatility than diversified portfolios. The risks of investing in a non-diversified portfolio may also be greater than the risks of investing in a diversified portfolio.

There can be no assurance that a client's investment objectives will be achieved and no inference to the contrary is being made. Prior to entering into an agreement with Swell, a client should carefully consider that volatility from investing in the stock market can occur and that over time the client's assets may fluctuate and at any time be worth more or less than the amount invested.

Swell does not represent, guarantee or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

#### Voting Client Securities

Swell does not have the authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting any and all securities maintained in client portfolios. Clients may be unable to vote fractional shares. Clients entitled to vote in shareholder elections will receive shareholder notices directly from Folio with instructions for submission.

Questions about proxies may be made via the contact information on the cover page of this Brochure.

#### Class Action Claims

Swell will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. Clients who own fractional shares may not be eligible to participate in class action claims or settlements.

**Item 7: Client Information Provided to Portfolio Managers**

Swell does not communicate client information to other portfolio managers.

**Item 8: Client Contact and Portfolio Managers**

The SIMP program is an online portfolio management platform and clients are not permitted to consult directly with Swell regarding their investment portfolio other than their election to remove specific securities from their portfolio mix. Swell will contact clients periodically to ensure that each client's account information including risk profile details remains up to date. Swell relies upon the accuracy of the information entered by the client when proposing an investment plan. The proposed plan may not be suitable if the client has provided incorrect information or the information is out of date.

To receive customer support, clients may contact Swell via email or telephone. Customer support is educational in nature only. In addition to the availability of Swell's customer support personnel, Swell provides a multitude of materials prepared by investment professionals relating to client portfolios and the investment decisions made for client accounts on its publicly available website, including a frequently asked questions site available at <https://support.swellinvesting.com>. This information is designed to address commonly asked questions clients have about their accounts and the management of their accounts, and customer service personnel may provide clients links to such material.

**Item 9: Additional Information**

Disciplinary Information

Swell and its employees have not been involved in any legal or disciplinary events that would be material to a client's evaluation of the company or its personnel.

Other Financial Industry Activities and Affiliations

Swell is an indirectly wholly owned subsidiary of Pacific Life. Through its direct and indirect subsidiaries, Pacific Life is engaged in a wide variety of insurance, financial services, and other investment-related businesses.

One of Swell's affiliates is an investor in Swell with significant allocations to each of the Swell portfolios. Due to the investment size and the primarily small-capitalization and mid-capitalization securities held in the portfolios, it is possible that investment decisions made by Swell's affiliate could impact the valuation and/or performance of the portfolios.

Swell has various financial industry affiliations that may be significant to its clients, including:

Cadence, a registered investment adviser and a wholly-owned subsidiary of Pacific Life, is the investment adviser to, and is compensated for various investment advisory and supervisory



services provided to, institutions, mutual funds, exchange traded funds and private pooled investment vehicles. Swell has contracted with Cadence to perform services for Swell in connection with the weighting of securities positions and the monitoring of investment risk in Swell's client portfolios. When engaging a related person to provide such services, Swell may have an incentive to recommend the related person even if another person may be more qualified to provide the applicable services and/or can provide such services at a lesser cost. Because Cadence employees manage Cadence's client portfolios in addition to providing security weights for Swell portfolios, they may be subject to a conflict of interest. For example, Cadence personnel could be incentivized to trade for their clients and for their personal accounts in advance of Swell's clients to take advantage of favorable price movements that could result from Swell clients' trading. To mitigate this potential conflict of interest, Swell and Cadence have implemented policies and procedures for the portfolio construction and rebalancing activities of Swell's portfolio models.

Pacific Life Fund Advisors LLC, which also does business under the name of Pacific Asset Management, a registered investment adviser and a wholly-owned subsidiary of Pacific Life, is the investment adviser and/or subadviser to and is compensated for various services provided to registered U.S. and non-U.S. funds, privately placed pooled investment vehicles, collateralized loan obligations, exchange traded funds as well as separate accounts.

Pacific Private Fund Advisors LLC, a registered investment adviser and a wholly-owned subsidiary of Pacific Life, is the investment adviser to and is compensated for various services provided on a discretionary basis to hedge fund-of-funds and private equity fund-of-funds products.

Pacific Global Advisors LLC, a registered investment adviser and a wholly-owned subsidiary of Pacific Life, is the investment adviser to and is compensated for various investment advisory and supervisory services to exchange traded funds.

Pacific Select Distributors LLC, a limited purpose broker-dealer which is a wholly-owned subsidiary of Pacific Life, serves as distributor of registered funds and variable products offered by Pacific Life and its affiliates. Swell does not use affiliated broker-dealers to execute transactions for clients.

#### Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Swell employees and persons associated with Swell are required to follow its Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Swell and its affiliates may trade for their own accounts in securities that are recommended to and/or purchased for Swell clients. The Code of Ethics is designed to ensure that the personal securities transactions, activities and interests of the employees of Swell will not interfere with (i) making decisions in the best interest of advisory clients or (ii) implementing such decisions while, at the same time, allow employees to invest for their own accounts.

Under the Code of Ethics, certain classes of securities have been designated as exempt securities and certain classes of transactions have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of Swell clients. In some circumstances, whereby an employee is permitted to invest in the same securities as clients, there is a possibility that employees may benefit from market activity within a client account. Employee trading is continually monitored for adherence to the Code of Ethics in order to ensure employees comply with its provisions and to ensure that the Code of Ethics reasonably

prevents conflicts of interest between Swell and its clients. Swell will provide a copy of its Code of Ethics to any client or prospective client upon request.

#### Review of Accounts

Clients have continuous access to reporting, account status, performance reporting and balances via Swell's online site. The performance of the Impact 400 and the thematic portfolios that comprise Swell's client accounts are monitored on an ongoing basis, and Swell's portfolio management personnel meet weekly to discuss market developments, the performance of each portfolio, corporate actions, and emerging controversies that could require changes to such portfolios. Swell's portfolios are rebalanced approximately once every six months, and are reconstructed annually to ensure that each remains invested in accordance with its SRI mandate. At Swell's discretion, portfolio changes may be made other than semi-annually.

Clients receive account statements directly from Folio usually monthly, but not less than quarterly.

#### Client Referrals and Other Compensation

Neither Swell nor any of its employees receive any economic benefits from any third parties with respect to the advisory services offered to clients.

Swell offers compensation to unaffiliated marketers, solicitors and other strategic partners who recommend Swell and refer new clients. Some of those individuals may also be clients of Swell. New clients are advised of such compensation prior to opening an account. Clients are not charged any fee nor do they incur any additional costs for being referred to Swell by an affiliate marketer, solicitor or other strategic partner. In addition, Swell expects from time to time to run promotional campaigns to attract new clients to open an account. These promotions may include additional account services or products offered on a limited basis to select clients, more favorable fee arrangements, reimbursement of account opening minimums, and/or reduced or waived advisory fees for clients. These arrangements may create an incentive for a third-party or other existing client to refer prospective clients to Swell, even if the third-party would otherwise not make the referral. These arrangements may also create a conflict of interest for a client to maintain a certain level of assets managed through Swell if doing so would result in eligibility to receive an incentive, bonus or additional compensation.

#### Financial Information

A balance sheet is not required to be provided as Swell (i) does not solicit fees more than six months in advance, (ii) does not have a financial condition that is likely to impair its ability to meet contractual commitments to clients or (iii) has not been subject to any bankruptcy proceeding during the past 10 years.



## **Swell Investing LLC**

### **Form ADV Part 2B**

### **Brochure Supplement**

August 15, 2018

**301 Arizona Avenue  
Suite 400  
Santa Monica, CA 90401  
(949) 566-8985  
swellinvesting.com**

Swell Investing LLC (“Swell”) is an SEC registered investment adviser and wholly owned subsidiary of Pacific Life Insurance Company. This Brochure Supplement provides information about David N. Fanger, Amberjae Freeman, Jake Raden, and Lily Bowles that supplements the Swell Investing LLC Wrap Fee Program Brochure (the “Brochure”). You should have received a copy of the Brochure. If you did not receive a copy of Swell’s Brochure or have any questions about the contents of this Brochure Supplement, please contact us at 949-566-8985 or email [support@swellinvesting.com](mailto:support@swellinvesting.com). 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.

SEC registration of an investment adviser does not imply a certain level of skill or training.

## David N. Fanger

### **ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

#### ***Name and Year of Birth.***

David N. Fanger, Born 1977

#### ***Education.***

University of California, Los Angeles, Anderson School of Management: M.B.A., 2015  
Ball State University: B.S., Actuarial Science, 1999

#### ***Business Background.***

Swell Investing LLC: Chief Executive Officer (2015-Present)  
Pacific Life Insurance Company: Assistant Vice President (2008-2016)  
Mercer, Senior Associate (1999-2008)

#### ***Professional Designations.***

##### **Chartered Financial Analyst (2010)**

The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

##### **Fellow of the Society of Actuaries (2006)**

The Fellow of the Society of Actuaries (FSA) is a professional designation established by the Society of Actuaries (SOA), a professional organization for actuaries. Requirements to attain the FSA designation include exams, e-Learning courses and modules, validation of educational experiences outside the SOA education system, a professionalism seminar and the Fellowship Admissions Course.

##### **Member, American Academy of Actuaries (2005)**

The American Academy of Actuaries was formed in 1965 in order to be the national actuarial association for the United States. Requirements to gain membership (MAAA) include becoming a fully qualified member of an International Actuarial Association such as by holding the FSA designation; a minimum of three years of responsible actuarial experience; and, through examination or documented professional development, demonstrate knowledge of the law applicable to the statement of actuarial opinion.

### **ITEM 3: DISCIPLINARY INFORMATION**

None

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

None.

**ITEM 5: ADDITIONAL COMPENSATION**

None.

**ITEM 6: SUPERVISION**

Mr. Fanger is supervised by Adrian Griggs. Should you have any questions related to the supervision of David Fanger, please contact Adrian Griggs at 949-219-5364.

## Amberjae Freeman

### ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### ***Name and Year of Birth.***

Amberjae Freeman, Born 1982

#### ***Education.***

University of California, Santa Barbara, International Studies, M.A. (2008)

University of California, Santa Barbara, International Studies, B.A. (2004)

#### ***Business Background.***

Swell Investing LLC, Impact Analyst (2017 - Present)

ESG Solutions, Consultant (2016-2017)

RBC Wealth Management, Environmental Social and Governance Analyst (2010-2015)

Center for Gender & Refugee Studies, UC Hastings (2009-2010)

#### **Professional Designations.**

None

### ITEM 3: DISCIPLINARY INFORMATION

None

### ITEM 4: OTHER BUSINESS ACTIVITIES

None

### ITEM 5: ADDITIONAL COMPENSATION

None

### ITEM 6: SUPERVISION

Ms. Freeman's portfolio management activities are overseen by David Fanger. Should you have any questions related to the supervision of Amberjae Freeman, please contact David Fanger, Chief Executive Officer of Swell at 949-219-3012.

## Jake Raden

### ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

***Name and Year of Birth.***

Jake Raden, 1982

***Education.***

Creighton University, Masters of Public Health (2015)

University of Chicago, Environmental Studies, B.A. (2005)

***Business Background.***

Swell Investing LLC, Impact Analyst (April 2018 - Present)

Skechers Inc, Senior Analyst, International Finance (September 2016 - April 2018)

Green Alpha Advisors, Vice President - Research (May 2014-July 2016)

**Professional Designations.**

None

### ITEM 3: DISCIPLINARY INFORMATION

None

### ITEM 4: OTHER BUSINESS ACTIVITIES

None

### ITEM 5: ADDITIONAL COMPENSATION

None

### ITEM 6: SUPERVISION

Mr. Raden's portfolio management activities are overseen by David Fanger. Should you have any questions related to the supervision of Jake Raden, please contact David Fanger, Chief Executive Officer of Swell at 949-219-3012.

## Lily Bowles

### **ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

***Name and Year of Birth.***

Lily Bowles, Born 1989

***Education.***

London School of Economics, International Development, M.Sc. (2015)

University of Virginia, Political & Social Thought, B.A. (2012)

***Business Background.***

Swell Investing LLC, Impact Analyst (October 2018 - Present)

Aspiration Partners, Sustainability Officer (May 2016 - October 2018)

Village Capital, Global Operations Manager (September 2012-August 2014)

***Professional Designations.***

Fundamentals of Sustainability Accounting (FSA) Credential (2017)

The Fundamentals of Sustainability Accounting (FSA) Credential is a professional designation established by the Sustainability Accounting Standards Board (SASB), a nonprofit organization dedicated to enhancing the transparency of financially material sustainability information to investors. Requirements to attain the FSA designation include the successful completion of two examinations, the first of which focuses on sustainability principles and emerging practices, and the second of which tests the application of such principles and practices.

### **ITEM 3: DISCIPLINARY INFORMATION**

None

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

None

### **ITEM 5: ADDITIONAL COMPENSATION**

None

### **ITEM 6: SUPERVISION**

Ms. Bowles's portfolio management activities are overseen by David Fanger. Should you have any questions related to the supervision of Lily Bowles, please contact David Fanger, Chief Executive Officer of Swell at 949-219-3012.