

March 11, 2024

Firm Introduction

Pebble RIA, LLC d/b/a Pebble Finance (“Pebble”) is a registered investment adviser with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Pebble offers internet-only advisory investment advisory services to “retail investors.” As disclosed in our Form ADV Parts 1A and 2A, Pebble offers portfolio management services to individuals and investment advisers that may be working on behalf of individuals. Pebble recommends passive and active portfolio management strategies. Pebble does not sponsor or serve as portfolio manager for wrap investment programs.

How we monitor your accounts:

As part of our portfolio management services, described in Item 13 of our Form ADV Part 2A firm brochure, our advice rendered strictly through an online delivery solution designed to be operated directly by the user (“client”). Clients have unlimited access and use of Pebble’s system where they can review their account, portfolio allocation, etc., and make updates as necessary. Since Pebble is an Internet-only firm, by rule client services staff are available to assist clients with any platform technical issues they may experience via telephone, email, or online chat, but they do NOT provide trading advice or enter trading orders.

Investment Authority

Due to Pebble’s need to auto-rebalance accounts, Pebble prefers to manage client portfolios on a discretionary basis. By way of a client’s limited power of attorney, discretionary trading authorization allows Pebble to implement investment decisions to meet a client’s stated portfolio objectives, without requiring prior authorization for each transaction. Discretionary trading authority is granted by client to Pebble in Pebble’s Engagement Agreement. Otherwise, clients must execute trades on their own (“self-directed” trading). Clients can amend their account trading authority by submitting revised instructions via Pebble’s platform.

Limited Investment Offerings

Pebble does not make available or offer advice with respect to proprietary products or any limited select types of products (e.g., Pebble does not only recommend a money market account, etc.).

Account Minimums and Other Requirements

Pebble provides advisory investment services to individuals and high net worth individuals. Pebble does not require a minimum dollar amount to open or maintain an advisory account. For additional information, see [INSERT URL].

Conversation Starters: Review Our Frequently Asked Questions (FAQ) Page

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications?*

What fees will I pay?

A fixed fee is required to use Pebble’s portfolio management platform, which may be billed on a monthly or quarterly basis, in arrears, based on your selection at the time you open an account. Additional common fees which would be paid to the custodian could include account maintenance fees and transaction fees. Pebble does not charge or receive a commission or a mark-up on securities transactions, nor will Pebble or any associate be paid a commission on the purchase of a securities holding. Pebble does not receive SEC Rule 12b-1 fees (“trails”) from a mutual fund company if Pebble recommended mutual funds with those arrangements. You will pay advisory fees and associated account costs whether you make or lose money on your investment. Fees and costs will reduce any amount of

Pebble RIA, LLC (CRD #323301)

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money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information, please see Items 4 and 5 of our Form ADV Part 2A firm brochure which describe our services and fees in more detail, as well as Items 10 through 12 of our Form ADV Part 2A which discusses conflicts of interest as well as our Code of Ethics and standards of conduct.

Lastly, we have posted an easy to review “Fee Table” on the disclosures portion of our website.

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

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 Pebble acts as your investment adviser, Pebble must act in your best interest and not put its interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means: As described in Item 12 of our Form ADV Part 2A, we prefer that our portfolio management clients use the services of Alpaca Securities LLC, a FINRA and SIPC member firm. Alpaca Securities LLC offers firms like ours various services, which include custody of client assets, trade execution, clearance, and settlement, etc. Pebble receives other benefits from our custodian through participation in its independent investment adviser support program. If Pebble is charging a fee for our portfolio management, Pebble has an incentive to encourage clients to add assets even if the client would be better off keeping that money in savings, employer retirement plan, or another investment. Pebble serves as your fiduciary and we take our responsibilities seriously. We only intend to recommend investments that we believe are appropriate for each client. Please refer to Items 4, and 10 through 12 of our Form ADV Part 2A firm brochure for details.

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How might Pebble’s conflicts of interest affect me, and how will you address them?

For additional information, please see our Form ADV Part 2A firm brochure for details.

How do your financial professionals make money?

Pebble makes money by charging a fixed fee based on assets under Pebble management. Other than Pebble management, Pebble does not have financial professionals on staff that receive a percentage of earned fees. You could say we have “low overhead” in that regard.

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Who is my primary contact person? Is he or she a representative of an investment adviser? Who can I talk to if I have concerns about how this person is treating me?

Other than Pebble firm management, Pebble does not have financial professionals on staff. All “client interaction” involving investing is conducted via Pebble’s secure website.

Do you or your financial professionals have legal or disciplinary history?

No, neither Pebble nor its management have reportable legal or disciplinary history. Please visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

For additional information about our services, please refer to our Form ADV Part 2A firm brochure which discloses the information in this customer relationship summary document and provides greater detail. If you would like additional information or a copy of this disclosure, please see <https://pebble.finance/pebble-agreement>

Web: pebble.finance **Twitter:** twitter.com/pebble_finance

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LinkedIn: linkedin.com/company/76436799 **TikTok:** tiktok.com/@pebble_finance