

Brochure

Form ADV Part 2A

Item 1 - Cover Page



Blue Granite Capital, LLC **CRD# 125607**

215 East Bay Street, Suite 202C
Charleston, South Carolina 29401

(843) 722-7330

www.BlueGraniteCapital.com

March 3, 2020

This brochure provides information about the qualifications and business practices of Blue Granite Capital, LLC. If you have any questions about the contents of this brochure, please contact us at (843) 722-7330 or scott@bluegranitecapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Blue Granite Capital, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Blue Granite Capital, LLC also is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Material Changes

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on March 8, 2019. Of course the complete Brochure is available to clients at any time upon request.

Material Changes since Last Update:

Since our last filing on November 20, 2019, we have filed for registration with the state of South Carolina.

Item 3 - Table of Contents

Item 1 - Cover Page	1
Item 2 - Material Changes.....	1
Item 3 - Table of Contents	2
Item 4 - Advisory Business	3
Item 5 - Fees and Compensation	4
Item 6 - Performance-Based Fees and Side-By-Side Management	5
Item 7 - Types of Clients	6
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9 - Disciplinary Information	8
Item 10 - Other Financial Industry Activities and Affiliations	9
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	9
Item 12 - Brokerage Practices	10
Item 13 - Review of Accounts	11
Item 14 - Client Referrals and Other Compensation	12
Item 15 - Custody.....	12
Item 16 - Investment Discretion.....	12
Item 17 - Voting Client Securities	12
Item 18 - Financial Information.....	12
Item 19 - Requirements for State-Registered Advisers.....	13
Brochure Supplement.....	14

Item 4 - Advisory Business

General Information

Blue Granite Capital is a federally registered investment advisor as of April 2016. Blue Granite Capital was formed in 2003 and provides portfolio management services to its clients. Blue Granite Capital is wholly-owned by Scott B. Shubert, President and Chief Investment Officer of Blue Granite Capital. Please see ***Brochure Supplement***, Exhibit A, for more information on Mr. Shubert.

As of December 31, 2019, Blue Granite Capital managed \$41,915,733 on a discretionary basis, and no assets on a non-discretionary basis.

SERVICES PROVIDED

At the outset of each client relationship, Blue Granite Capital spends time with the client, asking questions, discussing the client's investment experience and financial circumstances, and reviewing options for the client. Based on its reviews, Blue Granite Capital generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments Blue Granite Capital will make on behalf of the client to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

Where Blue Granite Capital provides general consulting services, Blue Granite Capital will work with the client to prepare an appropriate summary of the specific project(s) to the extent necessary or advisable under the circumstances.

Portfolio Management

As described above, at the beginning of a client relationship, Blue Granite Capital meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Blue Granite Capital based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, Blue Granite Capital will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, Blue Granite Capital will have the authority to supervise and direct the portfolio without prior consultation with the client.

Notwithstanding the foregoing, clients may impose certain written restrictions on Blue Granite Capital in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ, and clients should not expect that the composition or performance of their investment portfolios will necessarily be consistent with similar clients of Blue Granite Capital.

Retirement Plan Investment Management Advisory Services

Blue Granite provides advisory services to plan sponsors of employer-sponsored retirement plans for which it has been specifically engaged. We are qualified to serve as an Investment Manager as defined in Section 3(38) of the Employee Retirement Security Act of 1974, as amended ("ERISA") and with respect to its obligation to provide the PLAN with initial and ongoing Investment Management Services as described under the "Portfolio Management" section of "SERVICES PROVIDED". Blue Granite acts as a "Fiduciary" to the PLAN consistent with Section 3(38) of ERISA; and with respect to the provision of discretionary investment management services described herein; and its duties solely in the interest of the Plan's Participants and beneficiaries.

Third Party Investment Management Services

Blue Granite Capital is available to provide Investment Management Services in conjunction with various Investment Advisory Firms in a third party management capacity. Blue Granite Capital is available to assist the primary investment professional or entity in the management of client portfolios by providing third party investment management and back office portfolio support. Services include the coordination of advisory fee deduction processes with qualified custodial firms. The primary investment professional retains the relationship with their clients and maintains the sole responsibility for all client contact as well as the initial and ongoing review of investors' individual needs, goals, time horizons, risk tolerance and suitability. Blue Granite Capital may provide professional support and assistance to investment professionals by assisting in the implementation and the delivery of ongoing professional management services. Where it is granted limited discretionary authority, Blue Granite Capital is responsible for investment management, best execution, and portfolio reporting (if to be provided per the Agreement). Blue Granite Capital will not provide individualized advice or recommendations to clients of Blue Granite Capital utilizing Blue Granite Capital for sub-advisory services.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to Blue Granite Capital are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Please see ***Item 12 - Brokerage Practices*** for additional information. Fees paid to Blue Granite Capital are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Blue Granite Capital and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

Portfolio Management Fees

The annual fee schedule is based on a percentage of assets under management, the complexity of services, or other factors and ranges from 0.50% to 1.00%.

The minimum portfolio value is generally set at \$500,000. Minimum annual fees may apply. Blue Granite Capital may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Blue Granite Capital deems it appropriate under the circumstances.

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With client authorization and unless other arrangements are made, fees are normally debited directly from client account(s).

Either Blue Granite Capital or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to Blue Granite Capital from the client will be invoiced or deducted from the client's account prior to termination.

Retirement Plan Investment Management Advisory Fees:

The annual fee schedule is based on a percentage of plan assets, the complexity of services, or other factors and ranges from 0.50% to 1.00%. Blue Granite Capital may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Blue Granite Capital deems it appropriate under the circumstances.

Retirement plan consulting fees will be billed on a quarterly basis, in advance, at the beginning of each calendar quarter, due within thirty (30) days after the date of invoice, unless otherwise agreed to by the parties. The fee will either be billed directly to the plan sponsor or paid directly from the plan assets if authorized by the plan fiduciary.

Third Party Investment Management Services Fees

Blue Granite Capital may be compensated for its third party portfolio management services in the form of an investment management fee, based upon a percentage of assets under management between 0.50% and 1.00% (50 to 100 basis points), as determined after considering the nature of portfolio management services, portfolio size, or complexity. The fee is agreed upon at the time of engagement, and is typically paid in arrears on the last business day of each month. Each month's fee is calculated and accrued based on the daily gross asset value of the Class Fund. Services initiated at any other time during a calendar quarter will be pro-rated. The Adviser's fee will be outlined in the written agreement between the primary Adviser and Blue Granite Capital.

Firms who contract Blue Granite Capital and their clients may terminate the services of Blue Granite Capital at any time upon receipt of written request or as otherwise agreed upon in the written agreement between the firm and Blue Granite Capital. Otherwise, service can be terminated with 30 days written notice and the Adviser will pro-rate any earned advisory fees.

If an account under this arrangement is subject to the Employee Retirement Income Security Act of 1974, as amended, ("*ERISA*"), the Adviser acknowledges that Adviser is a fiduciary within the meaning of the Act and the ERISA Client is a named fiduciary with respect to the control or management of the assets in the Account. In each instance, the Client will agree to obtain and maintain a bond satisfying the requirements of Section 412 of ERISA and to include the Adviser and the Adviser's principals, agents, and employees under those insured under that bond and will deliver to the Adviser a copy of the governing plan documents. If the Account assets for which the Adviser provides services represent only a portion of the assets of an employee benefit plan, Client will remain responsible for determining an appropriate overall diversification policy for the assets of such plan.

Item 6 - Performance-Based Fees and Side-By-Side Management

Blue Granite Capital does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Blue Granite Capital has no performance-based fee accounts, it has no side-by-side management.

Item 7 - Types of Clients

Blue Granite Capital serves individuals, pension and profit-sharing plans, and corporations. With some exceptions, the minimum portfolio value eligible for conventional investment advisory services is \$500,000. Minimum annual fees may apply. Under certain circumstances and in its sole discretion, Blue Granite Capital may negotiate such minimums.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

In accordance with the Investment Plan, Blue Granite Capital will primarily invest in common stocks, individual bonds, and some ETFs. The Investment Plan recommended by Blue Granite Capital will generally contain assets in classes that we believe, based upon historical data, have attractive combinations of return, risk, and correlation. Emphasis will be placed on optimizing performance at the portfolio level while attempting to control risk through diversification and asset allocation.

In making selections of individual stocks for client portfolios, Blue Granite Capital may use any of the following types of analysis:

Fundamental Analysis – involves review of the business and financial information about an issuer. Without limitation, the following factors generally will be considered:

- Financial strength ratios;
- Price-to-earnings ratios;
- Dividend yields; and
- Growth rate-to-price earnings ratios.

Blue Granite Capital will incorporate other methods of analysis, such as:

Charting Analysis – involves gathering and processing price and volume information for a particular security. Blue Granite Capital's charting analysis includes, without limitation:

- mathematical analysis;
- graphing charts; and estimations of future price movements based on perceived patterns and trends.

Technical Analysis – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

Cyclical Analysis – is a type of technical analysis that involves evaluating recurring price patterns and trends.

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. Blue Granite Capital may evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

ETFs are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

Investment Strategies

Blue Granite Capital provides advisory services for portfolios ranging from moderately aggressive to conservative, designed to meet the varying needs of investors. Based upon client input, the portfolio is designed to best suit their individual needs as defined by their objectives, risk tolerance and time horizons.

Blue Granite Capital's strategic approach is to invest each portfolio in accordance with the Plan that has been developed specifically for each client. This means that the following strategies may be used in varying combinations over time for a given client, depending upon the client's individual circumstances.

Long Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Margin Transactions – a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Trading – generally considered holding a security for less than thirty (30) days.

Options Trading/Writing: a securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the exercise of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option.

Core Equity Strategy

The goal of the Core Equity Strategy is to outperform the broad equity market over market cycles with lower downside capture in negative market environments. The strategy centers around the construction of a value-tilted, equity portfolio focused on long-term capital appreciation and dividend income. To achieve the strategy goals, the portfolio is composed of holdings in the shares of larger market-value companies and diversified amongst industries sectors and geographic regions of revenue production. Within a diversified total equity market allocation, this strategy can be employed as a broad market anchor and provide exposure to higher volatility/less correlated equity strategies where outperformance opportunities are more robust, such as emerging markets or small cap strategies.

Risk of Loss

While Blue Granite Capital seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks that clients should be prepared to bear. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While Blue Granite Capital manages client investment portfolios based on Blue Granite Capital's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Blue Granite Capital allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that Blue Granite Capital's specific investment choices could underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, Blue Granite Capital may invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. Blue Granite Capital may invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. Blue Granite Capital may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. Blue Granite Capital may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Blue Granite Capital or the integrity of Blue Granite Capital's management. Blue Granite Capital has no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Blue Granite Capital nor its Management Person has any financial industry activities or affiliations to report.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics and Personal Trading

Blue Granite Capital has adopted a Code of Ethics (“the Code”), the full text of which is available to you upon request. Blue Granite Capital’s Code has several goals. First, the Code is designed to assist Blue Granite Capital in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Blue Granite Capital owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with Blue Granite Capital (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Blue Granite Capital’s associated persons. Under the Code’s Professional Standards, Blue Granite Capital expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Blue Granite Capital associated persons are not to take inappropriate advantage of their positions in relation to Blue Granite Capital clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, Blue Granite Capital’s associated persons may invest in the same securities recommended to clients. Under its Code, Blue Granite Capital has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code’s personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading. These policies are designed to discourage and prohibit personal trading that would disadvantage clients.

Participation or Interest in Client Transactions

Blue Granite Capital has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. As outlined above, certain members of the Firm and its affiliated entities are also clients of Blue Granite Capital. Blue Granite Capital has full discretion over these accounts and respective investors have no input in the trades or investment decisions. In the event of any identified potential trading conflicts of interest, Blue Granite Capital’s goal is to place client interests first.

Consistent with the foregoing, Blue Granite Capital maintains policies regarding participation in initial public offerings (IPOs) and private placements in order to comply with applicable laws and avoid conflicts with client transactions.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person’s shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Blue Granite Capital’s written policy.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, Blue Granite Capital seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Blue Granite Capital may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of Blue Granite Capital's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Blue Granite Capital participates in Pershing's service program. While there is no direct link between the investment advice Blue Granite Capital provides and participation in the Pershing program, Blue Granite Capital receives certain economic benefits from the Pershing program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of Blue Granite Capital's fees from its clients' accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of Blue Granite Capital's accounts, including accounts not held at Pershing. Pershing may also make available to Blue Granite Capital other services intended to help Blue Granite Capital manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Pershing may make available, arrange and/or pay for these types of services to be rendered to Blue Granite Capital by independent third parties. Pershing may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to Blue Granite Capital, and/or Pershing may pay for travel expenses relating to participation in such training. Finally, participation in Pershing's program provides Blue Granite Capital with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in the Pershing program do not necessarily depend upon the proportion of transactions directed to Pershing. The benefits are received by Blue Granite Capital, in part because of commission revenue generated for Pershing by Blue Granite Capital's clients. This means that the investment activity in client accounts is beneficial to Blue Granite Capital, because Pershing does not assess a fee to Blue Granite Capital for these services. This creates an incentive for Blue Granite Capital to continue to recommend Pershing to its clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, Blue Granite Capital believes that Pershing provides an excellent combination of these services.

Soft Dollars

Generally, in addition to a broker's ability to provide "best execution," Blue Granite Capital may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. The provision of these added benefits may be based in whole or in part on the value of Blue Granite Capital's assets under management held at Pershing, on the brokerage revenue to Pershing generated by Blue Granite Capital's activities, or on a combination of these two factors. This is known as paying for those services or products with "soft dollars." Because many of the services or products could be considered to provide a benefit to Blue Granite Capital, and because the "soft dollars" used to acquire them are client assets, Blue Granite Capital could be

considered to have a conflict of interest in allocating client brokerage business. In this way, Blue Granite Capital could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation Blue Granite Capital might otherwise be able to negotiate. In addition, Blue Granite Capital could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal to generate brokerage compensation with which to acquire products and services.

Blue Granite Capital's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), Blue Granite Capital will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, Blue Granite Capital generally determines, considering all the factors described below, that the compensation to be paid to Pershing is reasonable in relation to the value of all the brokerage and research products and services provided by Pershing. In making this determination, Blue Granite Capital typically considers not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in Blue Granite Capital's performance of its overall responsibilities to all of its clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge.

Directed Brokerage

Blue Granite Capital does not generally allow directed brokerage accounts.

Aggregated Trade Policy

Blue Granite Capital typically directs trading in individual client accounts as and when trades are appropriate based on the client's Investment Plan, without regard to activity in other client accounts. However, from time to time, Blue Granite Capital may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, Blue Granite Capital will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by Blue Granite Capital or its officers, directors, or employees will be excluded first.

Item 13 - Review of Accounts

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Blue Granite Capital. These factors may include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Scott Shubert, Blue Granite Capital's President and Chief Investment Officer, reviews all accounts.

Account custodians are responsible for providing monthly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. Blue Granite Capital will provide additional written reports as needed or requested by the client.

Item 14 - Client Referrals and Other Compensation

As noted above, Blue Granite Capital may receive an economic benefit from Pershing in the form of support products and services it makes available to Blue Granite Capital and other independent investment advisors that have their clients maintain accounts at Pershing. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of Pershing's products and services to Blue Granite Capital is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither Pershing nor any other party is paid to refer clients to Blue Granite Capital.

Item 15 - Custody

Pershing is the custodian of all client accounts at Blue Granite Capital. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Blue Granite Capital of any questions or concerns. Clients are also asked to promptly notify Blue Granite Capital if the custodian fails to provide statements on each account held.

From time to time and in accordance with Blue Granite Capital's agreement with clients, Blue Granite Capital will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. There may at times be small differences due to the timing of dividend reporting and pending trades.

Item 16 - Investment Discretion

As described above under ***Item 4 - Advisory Business***, Blue Granite Capital manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, Blue Granite Capital will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Blue Granite Capital the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client; and, the withdrawal of advisory fees directly from the account. Blue Granite Capital then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with Blue Granite Capital and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between Blue Granite Capital and the client.

Item 17 - Voting Client Securities

As a policy and in accordance with Blue Granite Capital's client agreement, Blue Granite Capital does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact Blue Granite Capital with questions relating to proxy procedures and proposals; however, Blue Granite Capital generally does not research particular proxy proposals. Blue Granite does vote voluntary corporate actions on behalf of the client in accordance with internal written policies and procedures. A log of voluntary corporate actions is maintained.

Item 18 - Financial Information

Blue Granite Capital does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

Item 19 - Requirements for State-Registered Advisers

Educational Background and Business Experience of Principal Officers

Blue Granite Capital is wholly owned by Scott B. Shubert. His educational background and business experience can be found in the brochure supplement supplied as Part 2B.

Other Business Activities of Principal Officer

Please see the brochure supplement supplied as Part 2B.

Performance-Based Fees

Blue Granite Capital's investment adviser representatives do not currently charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

Disciplinary Information

Blue Granite Capital's investment adviser representatives are not subject to any arbitration claim or found liable in a civil, self-regulatory, or administrative proceeding.

Material Relationships with Issuers of Securities

Neither Blue Granite Capital nor its investment adviser representatives have any relationship or arrangement with issuers of securities.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Scott B. Shubert, CRD# 1083842

of

Blue Granite Capital, LLC

215 East Bay Street, Suite 202C
Charleston, South Carolina 29401

Phone: (843) 722-7330

www.BlueGraniteCapital.com

March 3, 2020

This brochure supplement provides information about Scott Shubert, and supplements the Blue Granite Capital, LLC ("Blue Granite Capital") brochure. You should have received a copy of that brochure. Please contact Scott Shubert at (843) 722-7330 if you did not receive Blue Granite Capital's brochure, or if you have any questions about the contents of this supplement.

Additional information about Scott is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

Scott B. Shubert – Chief Investment Officer

Scott Shubert, born 1954, is the Managing Partner and Chief Investment Officer of Blue Granite Capital. Scott has spent over 35 years working in the capital markets, advising institutional and individual clients in developing fixed income and equity portfolio strategies. Formerly Senior Vice President of Natixis Bleichroeder, Inc. for three years and then Senior Vice President of Salomon Smith Barney from 2000 until he formed Blue Granite Capital, LLC in April 2003. Scott also spent ten years on Wall Street responsible for Institutional Sales & Trading while working for major global banks, ING and Nomura Bank of Japan. Through his career, Scott has further developed comprehensive asset allocation strategies designed to enhance market performance, minimize risk and smooth volatility. His Institutional Sales responsibilities required extensive travel through Europe and Latin America as part of his advisory role in researching international equities for his clients in New York, Boston, London and Edinburgh.

Scott is currently the Managing Member of Blue Granite Capital LLC, a money management firm advising wealthy families and institutional clientele. He is a 1977 graduate of Ohio State University where he majored in Business, Finance and Economics.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Scott has no such disciplinary information to report.

Item 4 - Other Business Activities

Scott is not engaged in any other business activities outside of his roles noted above in Item 2 - Educational Background and Business Experience.

Item 5 - Additional Compensation

Scott has no other income or compensation to disclose.

Item 6 - Supervision

As the executive officer of Blue Granite Capital, Scott supervises all duties and activities of the firm. His contact information is on the cover page of this disclosure document.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

John M. Shubert, CRD# 867108

Located in

Orlando, Florida 32789

of

Blue Granite Capital, LLC

215 East Bay Street, Suite 202C
Charleston, South Carolina 29401

Phone: (843) 722-7330

www.BlueGraniteCapital.com

March 3, 2020

This brochure supplement provides information about John Shubert, and supplements the Blue Granite Capital, LLC ("Blue Granite Capital") brochure. You should have received a copy of that brochure. Please contact Scott Shubert at (843) 722-7330 if you did not receive Blue Granite Capital's brochure, or if you have any questions about the contents of this supplement.

Additional information about John is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

John M. Shubert

John Shubert, born 1956, is an investment adviser representative (IAR) of Blue Granite Capital. John M. Shubert has been an investment industry professional for 39 years and the past 24 years as Registered Investment Advisor/IAR and investment consultant specializing in the ERISA industry, providing fiduciary risk management and consulting services to retirement plans throughout the country. With over three decades of experience, John has pioneered employee investment asset allocation and plan participant communications programs that have gained national attention. He has been instrumental in developing industry leading customized corporate retirement plan oversight monitoring services and is a recognized authority and speaker on ERISA plan fiduciary processes. Mr. Shubert's client's at his prior firm included Fortune 500 companies and corporate clients with qualified plan assets totaling approximately \$3 billion. He has served as an industry consultant, moderator, and also served on the advisory boards of major financial institutions. John was nominated for The 401k Wire's 'Most Influential DC Advisors 2010-2012, and for 2011 401(k) Advisor Leadership Award sponsored by Morningstar and ASPPA (American Society of Pension Professionals & Actuaries).

He is a 1978 graduate of Rollins College where he earned a Bachelor of Arts in Business Administration.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, John has no such disciplinary information to report.

Item 4 - Other Business Activities

John is in process of reviewing a referral arrangement/agreement with Boring But Great, Inc, dba Vendorful as it relates to their financial services RFP technology platform. He will create a distribution entity that will receive referral income from this business relationship which is anticipated to begin in September 2018. John anticipates spending approximately 20 hours per month in this role.

Item 5 - Additional Compensation

John has no other income or compensation to disclose.

Item 6 - Supervision

As the executive officer of Blue Granite Capital, Scott Shubert supervises all duties and activities of the firm. His contact information is on the cover page of this disclosure document.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

David W. Scates, CRD# 4701911

Located in

Denver, Colorado 80209

of

Blue Granite Capital, LLC

215 East Bay Street, Suite 202C
Charleston, South Carolina 29401

Phone: (843) 722-7330

www.BlueGraniteCapital.com

March 3, 2020

This brochure supplement provides information about David Scates, and supplements the Blue Granite Capital, LLC ("Blue Granite Capital") brochure. You should have received a copy of that brochure. Please contact Scott Shubert at (843) 722-7330 if you did not receive Blue Granite Capital's brochure, or if you have any questions about the contents of this supplement.

Additional information about David is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

David Weeks Scates

David Scates, born 1981, is an investment adviser representative of Blue Granite Capital. David began his career as a fixed income trader and analyst at Parker Trading (Gelber Group LLC) in June of 2003. After five years, he struck out on his own to start DWS Trading. As the founder and President of DWS Trading, David primarily focused on commodities, equities, and derivatives trading. He spent over six years in this role until becoming the U.S. Treasuries and Equity Index Manager at Gelber Group LLC in February of 2015. In June of 2016, David relocated to Denver, Colorado to resume management of his firm DWS Trading, specializing in trading and investing opportunities in the commodity and derivative markets.

He is a 2003 graduate of The Citadel in Charleston, South Carolina where he earned a Bachelor of Science in Business Administration.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, David has no such disciplinary information to report.

Item 4 - Other Business Activities

David has no other business activity to disclose.

Item 5 - Additional Compensation

David has no other income or compensation to disclose.

Item 6 - Supervision

As the executive officer of Blue Granite Capital, Scott Shubert supervises all duties and activities of the firm. His contact information is on the cover page of this disclosure document.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Richard Heath Proctor III, CRD# 7230394

Located in

Winter Park, Florida 32789

of

Blue Granite Capital, LLC

215 East Bay Street, Suite 202C
Charleston, South Carolina 29401

Phone: (843) 722-7330

www.BlueGraniteCapital.com

March 3, 2020

This brochure supplement provides information about Richard Heath Proctor III, and supplements the Blue Granite Capital, LLC ("Blue Granite Capital") brochure. You should have received a copy of that brochure. Please contact Scott Shubert at (843) 722-7330 if you did not receive Blue Granite Capital's brochure, or if you have any questions about the contents of this supplement.

Additional information about Richard is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

Richard Heath Proctor III

Richard Heath Proctor III, born in 1981, is an Investment Adviser Representative of Blue Granite Capital. Mr. Proctor has 12 years of Investment Management industry experience in the areas of client relationship management and marketing. Richard has managed large-scale institutional clients globally from private and public pension funds to sovereign wealth, mutual fund, and endowment clients in the United States, Canada, Australia, Asia, and Europe. The accounts that Mr. Proctor has worked with have ranged in value between \$20 million in assets under management to \$2 billion in assets under management and have spanned a variety of different product offerings including Global, International, and Emerging Markets equity strategies. Mr. Proctor has also worked extensively with a number of the largest institutional investment consultants worldwide in both client service and marketing/business development capacities.

He is a 2003 graduate of Davidson College in Davidson, North Carolina where he earned a Bachelor of Arts degree in Political Science.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Richard has no such disciplinary information to report.

Item 4 - Other Business Activities

Richard has no other business activity to disclose.

Item 5 - Additional Compensation

Richard has no other income or compensation to disclose.

Item 6 - Supervision

As the executive officer of Blue Granite Capital, Scott Shubert supervises all duties and activities of the firm. His contact information is on the cover page of this disclosure document.