

**Blue Investment Management, LLC
dba Dhody Investment Group**

Form ADV Part 2A – Disclosure Brochure

Effective: September 6, 2022

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Blue Investment Management, LLC dba Dhody Investment Group (“DIG” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (305) 433-4250.

DIG is a registered investment advisor with U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about DIG to assist you in determining whether to retain the Advisor.

Additional information about DIG and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 318610.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of DIG. For convenience, the Advisor has combined these documents into a single disclosure document.

DIG believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. DIG encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes to this Disclosure Brochure.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 318610. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (305) 433-4250.

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Item 4 – Advisory Services

A. Firm Information

Blue Investment Management, LLC dba Dhody Investment Group (“DIG” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Florida. DIG was founded in January 2022 and became a registered investment advisor in March 2022. DIG is a wholly-owned subsidiary of Blue Investment Partners, LLC (the Holding Company and herein “BIP”), a Florida limited liability company. Sanjan Dhody serves as the Chief Executive Officer and Managing Partner of the Advisor as well as the Managing Member of BIP.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by DIG. For information regarding this Disclosure Brochure, please contact Ileana M. Cohn (Chief Compliance Officer) at (305) 433-4250.

B. Advisory Services Offered

DIG offers advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith towards each Client and seeks to mitigate conflicts of interest. DIG’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

DIG provides customized investment management and advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary or non-discretionary investment management and related advisory services. DIG works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to design a portfolio strategy. DIG will construct an investment portfolio in connection with the Client’s needs and objectives. Investments in the Client’s investment portfolios may include cash and equivalents, exchange-listed equities, mutual funds, fixed income securities, and private investments, including hedge funds and private equity investments. The Advisor may also utilize other types of investments, as appropriate, to meet the needs of the Client. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

The Advisor, in connection with its affiliated entity Blue Investment Partners, II (“BIP II”), will typically recommend that Qualified Clients (as defined in Item 5 below) invest in certain private investments sourced by BIP II. Please see Items 5, 6, and 10 below.

DIG evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. DIG may recommend, on occasion, redistributing investment allocations to diversify the portfolio. DIG may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement.

DIG may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Use of Independent Managers – DIG may recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. In certain instances, the Client may be required to authorize and enter into an investment advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing

oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Clients investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

Private Equity Investments

As disclosed above, Clients may be offered investment interests in BIP II, an affiliate of DIG, or special purpose investment vehicles ("SPVs") sourced by BIP II to invest in private equity investments.

Financial Planning Services

DIG will typically provide a variety of financial planning and consulting services to Clients. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. DIG may also refer Clients to an accountant, attorney, or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For project-based or ad-hoc engagements, the Advisor may not provide a written summary. Project-based financial plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly. Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging DIG to provide advisory services, each Client is required to enter into a written advisory agreement with the Advisor that define the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – DIG, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – DIG will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client or unique client goal.
- Portfolio Construction – DIG will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – DIG will provide investment management and ongoing oversight of the Client's investment portfolio, including private investments.

D. Wrap Fee Programs

DIG does not manage or place Client assets into a wrap fee program.

E. Assets Under Management

As of the date of this Disclosure Brochure, the Advisor manages \$142,388,417, all of which are managed on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written advisory agreement with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment or advisory fees are generally paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees range up to 1.00% annually and are based on the market value of assets under management at the end of the prior quarter. Certain Clients may be offered a fixed fee schedule instead of a tiered schedule for all or some of the Client's accounts.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor across all accounts, unless otherwise agreed in writing. All securities held in accounts managed by DIG will be independently valued by the Custodian. DIG will not have the authority or responsibility to value portfolio securities.

Clients may make additions to and withdrawals from their account[s] at any time, subject to DIG's right to terminate an account. Additions may be in cash or securities provided that DIG reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to DIG, subject to the usual and customary securities settlement procedures. However, DIG designs its portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a Client's investment objectives. DIG may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The Advisor will allocate a portion of the advisory fee collected to the Independent Manager pursuant to the terms of the executed agreement between the Advisor and the Independent Manager. If the Client is required to authorize and enter into an investment advisory agreement with an Independent Manager then the terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager.

Blue Investment Partners II, LLC Investments

Clients seeking access to investments sourced through BIP II will pay an Access Fee to BIP II upon the execution of the appropriate private placement documents or subscription agreement with BIP II. The Access Fee is disclosed to the Client prior to entering into an agreement with BIP II. The Access Fee, if applicable, is payable to BIP II. Please see Item 10 for additional disclosures as well as the BIP II private placement documents or subscription agreement.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] in advance of each quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the market value of assets under management as of the end of the prior quarter. Clients will be provided with a statement, generally quarterly, from the Custodian reflecting the deduction of the investment advisory fee. Clients provide written authorization permitting advisory fees to be deducted by DIG to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

For Client accounts implemented through an Independent Manager, the Client's overall fees may include DIG's investment advisory fee (as noted above) plus investment advisory fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s]. In other instances the Advisor and the Independent Manager will each assume the responsibility for calculating and deducting their respective fees from the Client's account[s].

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s], including but not limited to: securities transaction fees, custody fees, wire fees, and Independent Manager fees.

In addition, all fees paid to DIG for investment management services are separate and distinct from the expenses charged by mutual funds, private funds, SPVs, and ETFs to their shareholders or limited partners, if applicable. Fees paid to BIP II are separate from DIG's fees. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of DIG but would not receive the services provided by DIG which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by DIG to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information. Additionally, as noted above, the Advisor will select share classes that do not have trading costs when possible. These will in most cases be institutional share classes but in some cases may be share classes with higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

DIG is compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination, and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination through the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for the termination will be set forth in the respective agreements between the Client or the Advisor and the Independent Manager. DIG will assist the Client with the termination and transition as appropriate.

E. Compensation for Sales of Securities

DIG does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons are also a Registered Representative of LPS Capital, LLC ("LPS Capital"), a registered broker-dealer (CRD# 155246), member FINRA, SIPC. In an Advisory Person's separate capacity as a Registered Representative of LPS Capital, the Advisory Person will implement securities transactions under LPS Capital and not through DIG. In such instances, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities. Compensation earned by the Advisory Person in one's capacity as a Registered Representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because the Advisory Person who is a Registered Representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a Registered Representative. Please see Item 10.

Mr. Dhody is also an Associated Person with LPS Futures LLC, an Introducing Broker with the National Futures Association ("NFA") LPS Futures is an affiliate of LPS Capital. Please see Item 10 below.

Mr. Dhody is also the Managing Member of BIP II. Please see item 10.

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

DIG does not charge performance-based fees for its investment management services. The fees charged by DIG are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

DIG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund). However, as disclosed in Items 4, Clients may be offered investment interests in BIP II or SPVs sourced with BIP II, which are or will be affiliates of the Advisor. Clients invested in these vehicles are subject to performance-based fees. Only "Qualified Clients" as defined below, who pay the Access Fee will be offered such investments.

Who is a "Qualified Client"?

The Investment Advisers Act of 1940 (the "Advisers Act"), Rule 205-3(d)(1) defines a "Qualified Client" who is financially sophisticated and meets one or more of the following conditions:

- Client is a natural person who, or a company that, immediately after entering into the contract has at least \$1,100,000 under the management of the Advisor;
- Client is a natural person who, or a company that, immediately prior to entering into the contract has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$2,200,000 at the time the contract is entered into with the Advisor.

The receipt of a performance fee results in a potential conflict of interest.

Item 7 – Types of Clients

DIG offers advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses. DIG generally does not impose a minimum relationship size, but has designed its services to meet the needs of ultra-high net worth investors.

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

A. Methods of Analysis

DIG primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from DIG are derived from numerous sources, including financial media companies, third-party research materials, professional data subscriptions, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria generally consists of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that DIG will be able to predict such a reoccurrence accurately.

As noted above, DIG generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. DIG will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, DIG may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class. Investments in private equity are typically illiquid and have other risks disclosed below.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. DIG will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond ETF Risks

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bonds time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investors rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily; therefore, a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments. The Advisor may recommend investments in one of more private equity investments, may carry material risk of loss. Further, such investment will likely be illiquid and are not redeemable.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Investors in BIP II should also carefully review the disclosures for that investment and any underlying investments.

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving DIG or its management persons. DIG values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 318610.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

As noted in Item 5, Advisory Persons are also Registered Representatives of LPS Capital. In an Advisory Person's separate capacity as a Registered Representative, the Advisory Person will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisory Person. Neither the Advisor nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a Registered Representative.

Introducing Broker Affiliation

Mr. Dhody is also an Associated Person with LPS Futures LLC, an Introducing Broker with the National Futures Association ("NFA") LPS Futures is an affiliate of LPS Capital. Less than 2% of business time is dedicated to this business activity.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

Private Investment Fund – Blue Investment Partners II, LLC

Blue Investment Partners II, LLC ("BIP II") is a private investment vehicle under common control with DIG. DIG intends to offer investment interests in private equity deals sourced by BIP II to Clients of DIG. DIG and Mr. Dhody receive compensation from Clients directly and indirectly for access to BIP II and its underlying investment opportunities. BIP II expects to structure individual special purpose investment vehicles ("SPVs") for each underlying investment made by BIP II. BIP II is currently an active entity, but has not created any SPVs to date. There is a conflict of interest associated with such recommendations as the Advisor's primary owners will earn additional compensation from investments made in or through BIP II. BIP II will generally earn a performance-based fee in the form of carried interest. Clients of the Advisor that seek access to these private equity deals, also pay an Access Fee (as defined above) at the start of each year. Please see item 5 above.

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

A. Code of Ethics

DIG has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with DIG ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. DIG and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of DIG' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (305) 433-4250.

B. Personal Trading with Material Interest

DIG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, including investments through BIP in which the owners of the Advisor may also have material interest. DIG does not act as a principal in any transactions. In addition, the Advisor does not act

as the general partner of a fund or advise an investment company. DIG does not have a material interest in any securities traded in Client accounts. However, Clients will be offered interests in BIP II, which Mr. Dhody has a material financial interest. Clients are reminded to also read the disclosures provided by BIP II before investing.

C. Personal Trading in Same Securities as Clients

DIG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by DIG requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information. Mr. Dhody and other Owners, Officers, and Supervised Persons are likely to invest in private equity investments sourced by BIP II.

D. Personal Trading at Same Time as Client

While DIG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward, when possible. **At no time will DIG, or any Supervised Person of DIG, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

DIG does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize DIG to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, DIG does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where DIG does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by DIG. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. DIG may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices. As Advisory Persons of DIG are also Registered Representatives of LPS Capital LLC, the Advisor may be limited in using other broker-dealers/custodians as LPS Capital must approve the use of any outside broker-dealer/custodian.

DIG will generally recommend that Clients establish their account[s] at Raymond James & Associates, Inc. ("Raymond James"). Raymond James is a FINRA-registered broker-dealer and member New York Stock Exchange/SIPC. Raymond James will serve as the Client's "qualified custodian". DIG maintains institutional relationships with Raymond James, whereby the Advisor receives economic benefits from the Custodian. Please see Item 14 below. Following are additional details regarding the brokerage practices of the Advisor:

DIG has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. Access to the Raymond James platform is provided at no charge to the Advisor. The Raymond James platform includes brokerage, custody, administrative support, record keeping, technology and related services designed to support registered investment advisors like DIG in serving Clients. These services are intended to serve the best interests of the Advisor's Clients.

Raymond James may charge securities transaction fees for effecting certain securities transactions. Raymond James enables the Advisor to obtain certain no-load mutual funds without securities transaction fees and other no-load funds at nominal transaction charges. Raymond James's transaction fee rates are generally considered discounted from customary retail brokerage rates. However, the transaction fees charged by Raymond James may be higher or lower than those charged by other custodians and broker-dealers. Please see Item 14 below for additional information.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **DIG does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - DIG does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis," where DIG will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). DIG will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

A Client may pay a commission that is higher than another qualified custodian might charge to effect the same transaction. The Advisor has determined in good faith that the commissions charged by Fidelity are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not necessarily the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the Custodian's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although the Advisor will seek competitive rates, to the benefit of all Clients, it may not necessarily obtain the lowest possible commission rates for specific Client account transactions. Although the investment research products and services that may be obtained by the Advisor will generally be used to service all of the Advisor's Clients, they may not equally benefit all Clients. Please also see Item 14.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. DIG will execute its transactions through the Custodian as authorized by the Client. DIG may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of DIG and periodically by the CCO. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify DIG if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic, or political events.

C. Review Reports

The Client will receive brokerage statements generally monthly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by DIG

DIG may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, DIG may receive non-compensated referrals of new Clients from various third-parties. Advisory Persons and DIG may receive additional compensation for other business activities as noted in Item 10 above.

Participation in Institutional Advisor Platform

As noted in item 12, DIG has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. As part of the arrangement, Raymond James also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Raymond James directly from independent research companies. The Advisor may also receive additional services and support from Raymond James. As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Raymond James's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Raymond James and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 above. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services. In addition, Raymond James has provided the Advisor with financial support in the launch of the Advisor and reimbursements for various third-party service providers.

Private Investment Fund – Blue Investment Partners II, LLC

As disclosed in Item 10, the Owners of DIG will earn additional compensation related to Client investments in BIP II, an affiliate of the Advisor. Please see Items 5 and 10.

B. Client Referrals from Solicitors

DIG does not engage paid solicitors for Client referrals.

Item 15 – Custody

All Clients must place their assets with a “qualified custodian.” Clients are required to engage the Custodian to retain their funds and securities and direct DIG to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by DIG to

ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

Item 16 – Investment Discretion

For certain accounts, DIG will have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by DIG. The discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by DIG will be in accordance with each Client's investment objectives and goals.

DIG will also have investment accounts that are non-discretionary. For such accounts, DIG will not have discretion over the selection and amount of securities to be bought or sold in the Client's account[s] without obtaining prior approval from the Client. The Advisor will contact the Client and obtain approval prior to executing trades or allocating investment assets.

Item 17 – Voting Client Securities

DIG does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies. However, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither DIG, nor its management, have any adverse financial situations that would reasonably impair the ability of DIG to meet all obligations to its Clients. Neither DIG, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. DIG is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

**Blue Investment Management, LLC
dba Dhody Investment Group**

Form ADV Part 2B – Brochure Supplement

for

**Sanjan Dhody, CIMA®
Chief Executive Officer and Managing Partner**

Effective: September 6, 2022

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Sanjan Dhody, CIMA® (CRD# 2786357) in addition to the information contained in the Blue Investment Management, LLC dba Dhody Investment Group (“DIG” or the “Advisor”, CRD# 318610) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the DIG Disclosure Brochure or this Brochure Supplement, please contact us at (305) 433-4250.

Additional information about Mr. Dhody is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2786357.

Item 2 – Educational Background and Business Experience

Sanjan Dhody, CIMA®, born in 1970, is dedicated to advising Clients of DIG as its Chief Executive Officer and Managing Partner. Mr. Dhody earned an M.S. in Finance from The University of Richmond - Robins School of Business in 1986. Mr. Dhody also earned his B.A. in Finance and Math from St. Xaviers College in 1982. Additional information regarding Mr. Dhody's employment history is included below.

Employment History:

Chief Executive Officer and Managing Partner, Blue Investment Management, LLC dba Dhody Investment Group	01/2022 to Present
Chief Executive Officer and Managing Partner, Blue Investment Partners II, LLC	01/2022 to Present
Registered Representative, LPS Capital LLC	06/2022 to Present
Associated Persons, LPS Futures LLC	06/2022 to Present
Financial Advisor, Raymond James & Associates, Inc.	09/2016 to 06/2022
Financial Advisor, Deutsche Bank Securities, Inc.	04/2005 to 09/2016

Certified Investment Management Analyst™ ("CIMA®")

The CIMA® certification signifies that an individual has met initial and ongoing experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. To earn CIMA® certification, candidates must: submit an application, pass a background check and have an acceptable regulatory history; pass an online Qualification Examination; complete an in-person or online executive education program at an AACSB® accredited university business school; pass an online Certification Examination; and have an acceptable regulatory history as evidenced by FINRA Form U-4 or other regulatory requirements and have three years of financial services experience at the time of certification.

CIMA® certificates must adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two ethics hours every two years to maintain the certification. The designation is administered through the Investment Management Consultants Association™ (IMCA®).

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Dhody. Mr. Dhody has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Dhody. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Dhody.*** However, we do encourage you to independently view the background of Mr. Dhody on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2786357.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Dhody is also a Registered Representative of LPS Capital, LLC ("LPS Capital"), a registered broker-dealer (CRD# 155246), member FINRA, SIPC. In Mr. Dhody's separate capacity as a Registered Representative of LPS Capital, Mr. Dhody will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Dhody. Neither the Advisor nor Mr. Dhody will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Dhody's separate capacity as a Registered Representative. Mr. Dhody spends approximately 25% of his time per month in his role as a Registered Representative of LPS Capital.

Private Investment Fund – Blue Investment Partners II, LLC

Mr. Dhody also serves as the Chief Executive Officer and Managing Partner of Blue Investment Partners II, LLC (“BIP II”), a private investment vehicle under common control with DIG. DIG intends to offer investment interests in private equity deals sourced by BIP II to Clients of DIG. DIG and Mr. Dhody receive compensation from Clients directly and indirectly for access to BIP II and its underlying investment opportunities. BIP II expects to structure individual special purpose investment vehicles (“SPVs”) for each underlying investment made by BIP II. BIP II is currently an active entity, but has not created any SPVs to date.

Other Private Investments

Mr. Dhody is an owner and investor in numerous private investments, some of which Clients may also be invested. Mr. Dhody is not an active member in any of these businesses.

Board Member

Mr. Dhody is Board Member with Jaws Hurricane Acquisition. This business activity represents less than 5% of Mr. Dhody’s time.

Item 5 – Additional Compensation

Mr. Dhody has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Dhody serves as the Chief Executive Officer and Managing Partner of DIG and is also supervised by Ileana M. Cohn, the Chief Compliance Officer. Ms. Cohn can be reached at (305) 433-4250.

DIG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of DIG. Further, DIG is subject to regulatory oversight by various agencies. These agencies require registration by DIG and its Supervised Persons. As a registered entity, DIG is subject to examinations by regulators, which may be announced or unannounced. DIG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

**Blue Investment Management, LLC
dba Dhody Investment Group**

Form ADV Part 2B – Brochure Supplement

for

**Cheryl B. Fineman
Chief Administrative Officer**

Effective: September 6, 2022

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Cheryl B. Fineman (CRD# 3025358) in addition to the information contained in the Blue Investment Management, LLC dba Dhody Investment Group (“DIG” or the “Advisor”, CRD# 318610) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the DIG Disclosure Brochure or this Brochure Supplement, please contact us at (305) 433-4250.

Additional information about Ms. Fineman is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 3025358.

Item 2 – Educational Background and Business Experience

Cheryl B. Fineman, born in 1975, is dedicated to advising Clients of DIG as its Chief Administrative Officer. Ms. Fineman earned a B.A. from University of Buffalo (SUNY) in 1997. Additional information regarding Ms. Fineman's employment history is included below.

Employment History:

Chief Administrative Officer, Blue Investment Management, LLC	06/2022 to Present
Registered Representative, LPS Capital LLC	06/2022 to Present
Registered Representative, Raymond James & Associates, Inc.	09/2016 to 06/2022
Associate, Deutsche Bank Securities Inc.	04/2005 to 09/2016

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Fineman. Ms. Fineman has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Fineman. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Fineman.*** However, we do encourage you to independently view the background of Ms. Fineman on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 3025358.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Ms. Fineman is also a Registered Representative of LPS Capital, LLC ("LPS Capital"), a registered broker-dealer (CRD# 155246), member FINRA, SIPC. In Ms. Fineman's separate capacity as a Registered Representative of LPS Capital, Ms. Fineman will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Fineman. Neither the Advisor nor Ms. Fineman will earn ongoing investment advisory fees in connection with any products or services implemented in Ms. Fineman's separate capacity as a Registered Representative. Ms. Fineman spends approximately 10% of her time per month in his role as a Registered Representative of LPS Capital.

Private Investment Fund – Blue Investment Partners II, LLC

Ms. Fineman also supports the business activities of Blue Investment Partners II, LLC ("BIP II"), a private investment vehicle under common control with DIG. DIG intends to offer investment interests in private equity deals sourced by BIP II to Clients of DIG. DIG and Ms. Fineman receive compensation from Clients directly and indirectly for access to BIP II and its underlying investment opportunities. BIP II expects to structure individual special purpose investment vehicles ("SPVs") for each underlying investment made by BIP II. BIP II is currently an active entity, but has not created any SPVs to date.

Item 5 – Additional Compensation

Ms. Fineman has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Fineman serves as the Chief Administrative Officer of DIG and is supervised by Ileana Cohn, the Chief Compliance Officer. Ms. Cohn can be reached at (305) 433-4250. DIG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of DIG. Further, DIG is subject to regulatory oversight by various agencies. These agencies require registration by DIG and its Supervised Persons. As a registered entity, DIG is subject to examinations by

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regulators, which may be announced or unannounced. DIG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

**Blue Investment Management, LLC
dba Dhody Investment Group**

Form ADV Part 2B – Brochure Supplement

for

**Ileana M. Cohn
Chief Compliance Officer**

Effective: September 6, 2022

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Ileana M. Cohn (CRD# 5527118) in addition to the information contained in the Blue Investment Management, LLC dba Dhody Investment Group (“DIG” or the “Advisor”, CRD# 318610) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the DIG Disclosure Brochure or this Brochure Supplement, please contact us at (305) 433-4250 .

Additional information about Ms. Cohn is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 5527118.

Item 2 – Educational Background and Business Experience

Ileana M. Cohn, born in 1983, is dedicated to advising Clients of DIG as the Chief Compliance Officer. Ms. Cohn earned a Bachelor in Business from University of Miami in 2007. Additional information regarding Ms. Cohn's employment history is included below.

Employment History:

Chief Compliance Officer, Blue Investment Management, LLC	06/2022 to Present
Investment Advisor Representative, Raymond James Financial Services Advisors, Inc.	01/2019 to 06/2022
Registered Representative, Raymond James Financial Services, Inc.	12/2018 to 06/2022
Regulatory Analyst, Raymond James & Associates, Inc.	09/2016 to 06/2017
Regulatory Analyst, Deutsche Bank Securities Inc.	10/2014 to 09/2016
Administrative Manager, E.S. Financial Services Inc.	11/2008 to 09/2014

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Cohn. Ms. Cohn has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Cohn. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Cohn.*** However, we do encourage you to independently view the background of Ms. Cohn on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 5527118.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Ms Cohn is also a Registered Representative of LPS Capital, LLC ("LPS Capital"), a registered broker-dealer (CRD# 155246), member FINRA, SIPC. In Ms. Cohn's separate capacity as a Registered Representative of LPS Capital, Ms. Cohn will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Cohn. Neither the Advisor nor Ms. Cohn will earn ongoing investment advisory fees in connection with any products or services implemented in Ms. Cohn's separate capacity as a Registered Representative. Ms. Cohn spends approximately 10% of her time per month in his role as a Registered Representative of LPS Capital.

Private Investment Fund – Blue Investment Partners II, LLC

Ms. Cohn also supports the business activities of Blue Investment Partners II, LLC ("BIP II"), a private investment vehicle under common control with DIG. DIG intends to offer investment interests in private equity deals sourced by BIP II to Clients of DIG. DIG and Ms. Cohn receive compensation from Clients directly and indirectly for access to BIP II and its underlying investment opportunities. BIP II expects to structure individual special purpose investment vehicles ("SPVs") for each underlying investment made by BIP II. BIP II is currently an active entity, but has not created any SPVs to date.

Item 5 – Additional Compensation

Ms. Ms. Cohn has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Cohn serves as the Chief Compliance Officer of DIG. Ms. Cohn can be reached at (305) 433-4250. DIG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of DIG. Further, DIG is subject to regulatory oversight by various agencies.

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These agencies require registration by DIG and its Supervised Persons. As a registered entity, DIG is subject to examinations by regulators, which may be announced or unannounced. DIG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: September 6, 2022

Our Commitment to You

Blue Investment Management, LLC dba Dhody Investment Group (“DIG” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. DIG (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

DIG does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. DIG shares Client information with LPS Capital LLC ("LPS Capital"). This sharing is due to the oversight LPS Capital has over certain Supervised Persons of the Advisor. You may also contact us at any time for a copy of the LPS Capital Privacy Policy. The Advisor shares non-public personal information with Blue Investment Partners, II and other affiliated entities in connection with the recommendation and implementation of private equity investments.	Yes	No
Marketing Purposes DIG does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where DIG or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients DIG does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (305) 433-4250.