

Brochure

Form ADV Part 2A

Item 1 - Cover Page

Anselme Capital, Inc.

CRD# 122278

5560 Jonesboro Way
Sacramento, California 95835

Mailing Address:
548 Market St #11465
San Francisco, California 94104

(415) 320-6902

www.AnselmeCapital.com

May 7, 2024

This Brochure provides information about the qualifications and business practices of Anselme Capital, Inc. If you have any questions about the contents of this Brochure, please contact us at (415) 320-6902 or marc@anselmecapital.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.

Anselme Capital, Inc. 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 ACI 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 5, 2024. Of course, the complete Brochure is available to you at any time upon request.

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Item 4 - Advisory Business

General Information

Anselme Capital, Inc. ("ACI") was originally registered in Georgia in December of 1997, and has since registered in other states as required by law. The firm registered in its current home state of California in February, 2003.

Marc J. Anselme and his wife Corinne Van Houten are the principal owners of ACI. Please see ***Brochure Supplement***, Exhibit A, for more information on Marc Anselme, who formulates all investment advice for clients.

As of December 31, 2023, ACI managed \$43,115,547 on a discretionary basis, and \$5,589,716 of assets on a non-discretionary basis.

SERVICES PROVIDED

In providing portfolio management services to our clients, at the outset of each client relationship we spend time with you, asking questions, discussing your investment experience and financial circumstances, and reviewing options for you. Based on our review, we generally develop:

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

The Financial Profile is a reflection of your current financial picture and a look to your future goals. The Investment Plan outlines the types of investments we will make or recommend on your behalf to meet those goals. The Profile and the Plan are discussed regularly with you, but are not necessarily written documents.

Portfolio Management

As described above, at the beginning of a client relationship, we meet with you, gather information and perform research and analysis as necessary to develop your Investment Plan. The Investment Plan will be updated from time to time when requested by you, or when determined to be necessary or advisable by us based on updates to your financial or other circumstances.

To implement your Investment Plan, we will manage your investment portfolio on a discretionary or a non-discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct your portfolio without prior consultation with you. Under a non-discretionary arrangement, you must be contacted prior to the execution of any trade in the account(s) under management. This can result in a delay in executing recommended trades, which could adversely affect the performance of your portfolio. In a non-discretionary arrangement, you retain the responsibility for the final decision on all actions taken with respect to your portfolio.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act of 1974 ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put

our interests ahead of yours. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between ACI and the client.

Notwithstanding the foregoing, you may impose certain written restrictions on us in the management of your investment portfolio, such as refusing the inclusion of real estate funds because of existing exposure to this sector outside of your managed portfolio, or prohibiting the sale of certain investments held in the account at the commencement of the relationship. You should note, however, that restrictions imposed by you may adversely affect the composition and performance of your investment portfolio. You should also note that your investment portfolio is treated individually by giving consideration to each purchase or sale for your account. For these and other reasons, performance of your investment portfolio within the same investment objectives, goals and/or risk tolerance may differ and you should not expect that the composition or performance of your investment portfolio would necessarily be consistent with similar clients of ours.

We publicly provide white papers (either text, slide or video presentations), a blog and a Facebook page with postings available to all clients, prospective clients and anyone who chooses to read them. The posts (blog or Facebook page) discuss general market and economic trends together with various financial theories and the way they are applied by us to design portfolios. These posts do not provide specific investment advice, but they may discuss the impact of various investment approaches and general matters relevant to wealth management. They may also provide general information about 401(k) accounts. Longer communication is done in the form of a white paper or blog post, while shorter communication is done in the form of a Facebook post and is usually accompanied by a referenced article. The white papers and blog posts can be accessed at www.anselmecapital.com, and the address of the Facebook page is www.facebook.com/anselmecapital1.

Held Away Assets

We offer ongoing advisory services to clients with assets held away from our primary custodian, such as 401(k) accounts. We have entered into a service agreement with Pontera (formerly FeeX Inc.) to provide asset management services for such accounts. Accordingly, we are able to create a portfolio consisting of the securities/investment opportunities available in the held away account you ask us to manage for you. The Pontera platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to your log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. Your individual investment strategy is tailored to your specific needs and will include some or all of the securities made available. Portfolios will be designed to meet a particular investment goal, determined to be suitable to your circumstances. Once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and rebalanced as needed. In accordance with state law, this service is not available to potential clients located in Washington state.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to us are exclusive of all custodial and transaction costs paid to your custodian, brokers or other third party consultants. Please see ***Item 12 - Brokerage Practices*** for additional information. Fees paid to us 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).

You should review all fees charged by funds, brokers, ACI and others to fully understand the total amount of fees paid by you for investment and financial-related services.

Portfolio Management Fees

The annual fee schedule, based on a percentage of assets under management, is as follows:

On the first \$2,000,000	0.90%
On the balance above \$2,000,000	0.75%

The minimum portfolio value is generally set at \$100,000. Retirement Plan services are subject to the same fee schedule listed above. We may, at our discretion, make exceptions to the foregoing or negotiate special fee arrangements where we deem 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 your authorization and unless other arrangements are made, fees are normally debited directly from your account. Either you or ACI may terminate your Investment Management Agreement at any time, subject to any written notice requirements in the agreement. You have the right to terminate the contract without penalty within five business days after entering into the contract. In the event of termination, any paid but unearned fees will be promptly refunded to you based on the number of days that the account was managed, and any fees due to us from you will be invoiced or deducted from your account prior to termination. In all instances, we will send you an invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. Also, we will include the name of the custodian(s) on your fee invoice. We will send these to you concurrent with the request for payment or payment of our advisory fees. We urge you to compare this information with the fees listed in the account statement.

The California Code of Regulations requires that all investment advisers disclose to their advisory clients that lower fees for comparable services may be available from other sources.

Held-Away Accounts

Any held-away accounts that you engage us to manage will be included in the fee calculations described above.

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

We do 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 we have no performance-based fee accounts, we have no side-by-side management.

Item 7 - Types of Clients

We serve individuals, corporations, trusts, and estates. With some exceptions, the minimum portfolio value eligible for conventional investment advisory services is \$100,000.

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

Methods of Analysis

In accordance with your Investment Plan, we will primarily invest in mutual funds, ETFs, and some common stocks at your request. We build, refine and optimize model portfolios composed of asset class funds from ***Dimensional Fund Advisors*** (DFA), a multi-billion-dollar institutional portfolio manager. We may also use other asset class fund providers as well. DFA manages assets exclusively for institutional investors and the clients of registered financial advisors like ACI. DFA funds are not available to the general public.

Financial publications, financial models and historical data trails about these indexes are reviewed and used to carry out the construction of the model portfolios.

Mutual funds and 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

Our strategic approach is to invest your portfolio in accordance with the Plan that has been developed specifically for you. This means that first the amount of capital you are dedicating to long term (five years or more) and short term (less than five years) investment is assessed. Each portion of the capital is then invested in a portfolio model that fits its specific need. Long term capital is invested in models that have higher historic volatility; short term capital is invested in models of more reduced historic volatility. The long or short term nature of each portion of capital is periodically updated over time.

We have developed a number of proprietary model portfolios. Once your Plan is developed, we will implement the Plan by investing in a model or a combination of more than one of these models. We will adjust your portfolio to match the selected model(s) over time. Trading volume during market cycles can vary considerably, leading to times of lower trading volume and other times of higher trading volume. During higher volume trading, your portfolio will incur more transaction costs as we place trades to keep the portfolio invested in line with the selected model(s).

Risk of Loss

While we seek to diversify your investment portfolio across various asset classes consistent with your Investment Plan in an effort to reduce risk of loss, all investment portfolios are nevertheless subject to risks. Accordingly, there can be no assurance that your investment portfolio will be able to fully meet your investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that your investment portfolio faces.

Management Risks. While we manage your investment portfolio based on our experience, research and proprietary methods, the value of your investment portfolio will change daily based on the performance of the underlying securities in which they are invested. Accordingly, your investment portfolio is subject to the risk that we allocate your assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that our specific investment choices could underperform their relevant benchmarks.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, we will usually invest your portfolio 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. We will generally invest portions of your assets directly into equity investments, primarily 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. We may invest portions of your 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. We may invest portions of your assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of your investment portfolio, 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 your evaluation of ACI or the integrity of our management. ACI has no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Neither ACI nor our Management Person has any other 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

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

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

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. Our associated persons are usually invested in our model portfolio as clients. Under our Code, we have adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause.

Participation or Interest in Client Transactions

As outlined above, we have adopted procedures to protect client interests when our associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, our goal is to place client interests first. Because we invest almost exclusively in open-end mutual funds and ETFs, such conflicts rarely if ever occur.

Even though stocks and IPOs are not usual components of our clients’ portfolios, the law requires that we maintain policies regarding participation in initial public offerings (“IPOs”) and private placements in order to comply with applicable laws and avoid conflicts with client transactions.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in your account, we seek “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, we 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 our clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

We participate in two institutional adviser programs (the “Programs”), one offered by Charles Schwab & Co., Inc. (“Schwab”), the other offered by Interactive Brokers Group, Inc. Both firms are members of FINRA/SIPC/NFA and are collectively referred to as the “Custodians.” Both companies offer their Programs to independent investment advisers. We receive some benefits from the Custodians through our participation in the Programs. We are independently owned and operated and are not affiliated with Schwab or Interactive Brokers Group.

We recommend that clients establish brokerage accounts with one of the Custodians for custody and brokerage services. Although ACI may recommend that clients establish accounts at one of these Custodians, it is ultimately the client's decision to choose a custodian.

The Custodians provide ACI with access to their institutional trading, custody, reporting and related services, which are typically not available to retail investors. The Custodians also make available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements, but are part of the institutional platform offered by the Custodians. Brokerage services provided by the Custodians include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For ACI client accounts maintained in their custody, the Custodians generally do not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through the Custodians or that settle into accounts at the Custodians. The Custodians are also compensated by earning interest on the uninvested cash in your account. The Custodians also make available to us other products and services that benefit ACI but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of our accounts, including accounts not maintained at the Custodian providing the products or services.

The Custodian's products and services that assist us in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of ACI's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

The Custodians also offer other services intended to help ACI manage and further develop its business enterprise. These services may include: (i) technology compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. The Custodians may make available, arrange and/or pay third-party vendors for the types of services rendered to us. The Custodians may discount or waive fees they would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. The Custodians may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend that clients custody their assets at one of the Custodians, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by the Custodians, which may create a potential conflict of interest.

Directed Brokerage

We do not generally allow directed brokerage accounts.

Aggregated Trade Policy

We typically direct trading in your account as and when trades are appropriate based on your Investment Plan, without regard to activity in other client accounts. However, from time to time, we 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, we 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 us or our 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 you, upon receipt of information material to the management of your portfolio, or at any time such review is deemed necessary or advisable by us. These factors generally include but are not limited to, the following: change in your general circumstances (marriage, divorce, retirement); or economic, political or market conditions. Marc J. Anselme, ACI's Founder and President, reviews all accounts.

Account custodians are responsible for providing monthly or quarterly 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. In addition, we provide a performance report for you. This performance report is available online and updated daily.

Item 14 - Client Referrals and Other Compensation

As noted above, we receive economic benefits from Schwab and Interactive Brokers Group in the form of support products and services they make available to us and other independent investment advisers whose clients maintain accounts at Schwab or Interactive Brokers Group. 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 Schwab's and Interactive Brokers Group's products and services to us is based solely on our participation in the Programs and not on the provision of any particular investment advice. Neither Schwab, Interactive Brokers Group nor any other party is paid to refer clients to us.

Item 15 - Custody

Either Schwab or Interactive Brokers Group serves as the custodian of most client accounts at ACI. In any case, it is the custodian's responsibility to provide you with confirmations of trading activity, tax forms and at least quarterly account statements. You are advised to review this information carefully, and to notify us of any questions or concerns. You are also asked to promptly notify us if the custodian fails to provide statements on each account held.

From time to time and in accordance with our agreement with you, we will provide additional reports. You are urged to compare the account balances reflected on these reports with the balances shown on the qualified custodian's statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting and pending trades.

Item 16 - Investment Discretion

As described in ***Item 4 - Advisory Business***, we will accept clients on either a discretionary or non-discretionary basis. For *discretionary accounts*, a Limited Power of Attorney (“LPOA”) is executed by you, giving us the authority to carry out various activities in your account, generally including the following: trade execution; the withdrawal of advisory fees directly from your account, and the ability to process your request for a check to be sent to the name and address of record on the account. We then direct investment of your portfolio using our discretionary authority. You may limit the terms of the LPOA to the extent consistent with your investment advisory agreement with us and the requirements of your custodian.

For *non-discretionary accounts*, you also generally execute an LPOA, which allows us to carry out trade recommendations and approved actions in your portfolio. However, in accordance with the investment advisory agreement between you and ACI, we do not implement trading recommendations or other actions in your account unless and until you have approved the recommendation or action. As with discretionary accounts, you may limit the terms of the LPOA, subject to our agreement with you and the requirements of your custodian.

Item 17 - Voting Client Securities

As a policy and in accordance with our client agreement, we do not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to you. You may contact us with questions relating to proxy procedures and proposals; however, we generally do not research particular proxy proposals.

Item 18 - Financial Information

We do not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance. Further, we have no financial condition that is likely to impair our ability to meet contractual commitments to you. Therefore, we have no disclosure required for this item.

Item 19 - Requirements for State-Registered Advisers

Marc Anselme is the principal executive officer and management person of ACI; his background information is provided elsewhere in this Form ADV (please see Brochure Supplement).

Mr. Anselme does not conduct outside business activities. Neither ACI nor any Supervised Person of ACI is compensated on a performance-fee basis. Neither the firm nor our Management Person has any disciplinary history requiring disclosure, and neither ACI nor our Management Person has any relationship or arrangement with any issuer of securities.

No other disclosure is required under this item.

Exhibit A

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Marc J. Anselme

CRD# 2567642

of

Anselme Capital, Inc.

5560 Jonesboro Way
Sacramento, California 95835

Mailing Address:
548 Market St #11465
San Francisco, California 94104

(415) 320-6902

www.AnselmeCapital.com

May 7, 2024

This Brochure Supplement provides information about Marc Anselme, and supplements the Anselme Capital, Inc. ("ACI") Brochure. You should have received a copy of that Brochure. Please contact us at (415) 320-6902 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 - Educational Background and Business Experience

Marc J. Anselme (year of birth 1959) is Founder and President of ACI. Marc's academic focus was engineering and math. He earned a B.S. degree in Chemical Engineering in 1983 from the National Polytechnic Institute, Toulouse, France. Marc also has earned a M.S. and a Ph.D. in Chemical Engineering (1988) from the Georgia Institute of Technology.

After a few years as a research scientist for Shell in Amsterdam and The Hague, Netherlands, his passion for investing pushed him to change his career. Marc became an Investment Counselor for Paine Webber, in Atlanta, and in 1998 he started ACI.

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, Marc has no such disciplinary information to report.

Item 4 - Other Business Activities

Marc is not engaged in any other business activities.

Item 5 - Additional Compensation

Marc has no other income or compensation to disclose.

Item 6 - Supervision

Marc is the President and owner of ACI and also serves as Chief Compliance Officer. As Chief Compliance Officer, Marc is responsible for providing compliance oversight to the staff. He may be contacted at (415) 320-6902.

Item 7 - State Requirements for State-Registered Advisers

In addition to Item 3 above, state-registered advisers are required to disclose all material facts regarding any event in which a supervised person of the firm was found liable in certain legal proceedings, or was the subject of a bankruptcy petition. Marc has no event to disclose with respect to this item.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Alexandre J. Anselme

CRD# 6655694

908B NW 56th Street
Seattle, Washington 98107

of

Anselme Capital, Inc.

Mailing Address:
548 Market St #11465
San Francisco, California 94104

(415) 320-6902

www.AnselmeCapital.com

May 7, 2024

This Brochure Supplement provides information about Alexandre “Alex” Anselme, and supplements the Anselme Capital, Inc. (“ACI”) Brochure. You should have received a copy of that Brochure. Please contact us at (415) 320-6902 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

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

Item 2 - Educational Background and Business Experience

Alexandre J. Anselme (year of birth 1990) is the Chief Financial Officer of ACI. Prior to joining ACI in January, 2016, Alex completed a half year internship at A.M.A. Selections in Mougins, France. During the internship, Alex worked in accounting and automation of accounting procedures and invoices.

Alex received a M.S. in Financial Markets and Investments from the Skema Business School in Sophia Antipolis, France in 2016 and a B.S. in Economics from the University of Oregon in 2014.

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, Alex has no such disciplinary information to report.

Item 4 - Other Business Activities

Alex is not engaged in any other business activities.

Item 5 - Additional Compensation

Alex has no other income or compensation to disclose.

Item 6 - Supervision

Marc Anselme, President and Chief Compliance Officer of ACI, is responsible for providing compliance oversight for Alex and for reviewing accounts. Marc can be reached at (415) 320-6902.

Item 7 - State Requirements for State-Registered Advisers

In addition to Item 3 above, state-registered advisers are required to disclose all material facts regarding any event in which a supervised person of the firm was found liable in certain legal proceedings, or was the subject of a bankruptcy petition. Alex has no event to disclose with respect to this item.