

TRIUMPH CAPITAL MANAGEMENT

FORM CRS ADV PART 3 BROCHURE

March 16, 2024

ITEM 1: INTRODUCTION

Triumph Capital Management (“TCM”) is registered with the Securities and Exchange Commission as an investment advisor. Please review this brochure to understand your relationship with our firm and your Investment Advisor Representative (“IAR”). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational material about broker-dealers, investment advisors, and investing.

ITEM 2: RELATIONSHIPS AND SERVICES

What investment services and advice does TCM provide? TCM offers discretionary investment advisory services for a fee based on a percentage of your assets that are under management. These services include investment analysis, allocation of investments, quarterly portfolio statements, financial commentaries, and ongoing monitoring of client portfolios. TCM will help in determining your portfolio composition based on your needs, portfolio restrictions, if any, financial goals, and risk tolerances. TCM will work with you to obtain necessary information regarding your financial condition, investment objectives, liquidity requirements, risk tolerance, time horizons, and any restrictions on investing. This information enables TCM to determine the portfolio best suited for your investment objectives and needs. For additional information regarding TCM’s services, please reference our ADV Part 2A Firm Brochure, Item 4.

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

ITEM 3: FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay? TCM charges a fee as compensation for providing investment advisory services on your account. These services include advisory and consulting services, trade entry, investment supervision, and other account-maintenance activities. The annual fee for portfolio management services is billed quarterly or monthly, in arrears or advance. The fee can be based on the average daily market value of the account or accounts during the billable period or based on the prior quarterly or monthly account balance. Due to deposits and/or trades settling, the prior account values used for fee calculation may vary from the account value shown on the custodian statement. Fees are assessed on assets under management, including securities, cash, and money market balances, unless otherwise noted in the client agreement. TCM can exclude positions for billing purposes. In addition to the advisory fees paid to TCM, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks, and other financial institutions. These additional charges may include securities brokerage commissions, transaction fees, custodial fees, and margin costs.

TCM’s maximum annual investment advisory fee is 3.00%. The specific advisory fees are outlined in your investment advisory client agreement. Fees may vary based on the size of the account, the complexity of the portfolio, the extent of activity in the account, or other reasons agreed upon by TCM and the client. When TCM acts as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information regarding TCM's fees, costs, conflicts, and standard of conduct, please reference our complete ADV Part 2A Firm Brochure, Item 4, Item 5, and Item 9.

Conversation Starter: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me? What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means: When we recommend an advisory account, a rollover of a retirement plan account, refer a client to a third-party asset manager, or provide additional services for compensation, these recommendations create, in and of themselves, an incentive to make these recommendations based upon the amount of compensation we receive, rather than based upon your needs.

Conversation Starter: How might your conflicts of interest affect me, and how will you address them? How do your financial professionals make money?

TCM's financial professionals are compensated by cash compensation from the advisory and financial planning fees that we charge you. Our fee for services may vary depending on such factors as the amount of client assets we service and the time and complexity required to meet your needs. Clients are advised that a conflict of interest exists when our financial professionals recommend our services to you, in that we will earn a fee from the services provided to you and the financial professional will be directly compensated from those fees.

ITEM 4: DISCIPLINARY HISTORY

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

TCM does not have any legal, financial, or disciplinary items to report. However, some of TCM's IARs do have disciplinary history. Your IAR will provide you with Form ADV 2B that is specific to their individual disciplinary record. Visit investor.gov/CRS for a free and simple search tool to research your financial professional.

Conversation Starter: As a financial professional, do you have any disciplinary history? For what type of conduct?

ITEM 5: ADDITIONAL INFORMATION

For additional information about our services, please read our complete Form ADV Part 2A Brochure. If you would like additional, up-to-date information or a copy of this disclosure, please download it from the SEC website or you may contact our Chief Compliance Officer, Brandon Drespling, at (720) 399-5555 or at BrandonD@TriumphCapitalManagement.com

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

Triumph Capital Management

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