

**Graham Y. Tanaka, CFA**  
Investment Advisor Representative

Tanaka Capital Management

60 East 42<sup>nd</sup> Street, Suite 4000  
New York, NY 10165  
Phone (212) 490-3380

As of March 31, 2024

**This brochure supplement provides information about Graham Y. Tanaka that supplements the Tanaka Capital Management (“TCM”) (CRD No. 109888) brochure. You should have received a copy of that brochure. Please contact us at (212) 490-3380 if you did not receive our brochure or if you have any questions about the contents of this supplement.**

**Additional information about Graham Y. Tanaka is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2- Educational Background and Business Experience**

Graham Y. Tanaka was born in 1948. He earned a Bachelor of Arts degree in Engineering & Urban Studies from Brown University in 1971, and an MBA from Stanford University in 1973. Mr. Tanaka earned his Chartered Financial Analyst (“CFA”) designation in 1976.

Mr. Tanaka has been a Financial Adviser for TCM since the firm was established in 1986. He is also President and Chief Investment Officer. TCM is a federally registered investment advisory firm. Prior to joining TCM, Mr. Tanaka was a research analyst at Morgan Guaranty Trust from 1973-1978, a Vice President at Fiduciary Trust Company of New York from 1978-1980, and Chairman at Milbank Tanaka & Associates from 1980-1986.

## **Item 3- Disciplinary Information**

Mr. Tanaka has not been subject to any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his services.

## **Item 4- Other Business Activities**

Mr. Tanaka is not currently actively engaged in any other investment-related business or occupation.

## **Item 5- Additional Compensation**

Mr. Tanaka does not receive any Economic Benefit from a non-client for providing advisory services.

For purposes of this Item, “Economic Benefits” include sales awards and other prizes, but do not include Mr. Tanaka’s regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts would also be considered an economic benefit, but other regular bonuses would not.

## **Item 6 - Supervision**

Mr. Tanaka’s activities on behalf of TCM are monitored by the firm's Chief Compliance Officer. The firm has adopted policies and procedures to oversee, monitor and control the activities of its Supervised Persons, one of which is Mr. Tanaka.

The person responsible for monitoring the advice and activities provided by Mr. Tanaka is:

Benjamin M. Bratt  
60 East 42<sup>nd</sup> Street, Suite 4000  
New York, NY 10165  
212-490-3380 (P)  
bb@tanaka.com