

Triton Wealth Management, LLC

Form ADV Part 2 – Disclosure Brochure

Effective: March 26, 2011

This Disclosure Brochure provides information about the qualifications and business practices of Triton Wealth Management, LLC (“TWM”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (866) 880-7500 or by email at support@tritonwm.com.

TWM is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“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 the qualifications and business practices of TWM.

Additional information about TWM and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 - Material Changes

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the “Advisers Act”). The amendments are designed to require a registered investment adviser to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor’s business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*.

Part 2A (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of TWM

TWM believes that communication and transparency are the foundation of our relationship and we continually strive to provide our Clients with complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Initial Filing

TWM is an established Registered Investment Advisor; however, this is the initial filing of the Disclosure Brochure pursuant to the new regulations.

Future Changes

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

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.

To review the firm information for TWM:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **132601** (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (866) 880-7500 or by email at support@tritonwm.com.

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Item 4 - Advisory Services

A. Firm Information

Triton Wealth Management, LLC ("TWM" or the "Advisor") is a Registered Investment Advisor with the U.S. Securities and Exchange Commission ("SEC"), which is organized as a Limited Liability Company ("LLC") under the laws of the State of Maryland. TWM was founded in 2008 and is owned and operated by Chief Compliance Officer and Managing Member Wayne B. Zussman. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by TWM.

B. Advisory Services Offered

TWM offers investment advisory services to individuals, high net worth individuals, pension and profit sharing plans, and corporations and businesses.

Account Portfolio Management

TWM provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. TWM works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. TWM will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs") to achieve the Client's investment goals. The Advisor may also utilize individual stocks and bonds to meet the needs of its Clients.

TWM's investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or as market conditions warrant. TWM will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

TWM evaluates and selects ETFs, mutual funds, stocks and fixed income instruments for inclusion in Client portfolios only after applying their internal due diligence process. TWM may recommend, on occasion, redistributing investment allocations to diversify the portfolio. TWM 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, which may adversely affect the portfolio. TWM 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 asset classes in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Advisory Programs

TWM may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a advisory program at the Client's selected custodian (the "Program Sponsor"). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account. TWM will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add TWM's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. The asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected. **TWM does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than TWM's Investment Advisory Fee (described in Item 5).**

Advisory Programs - continued

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, TWM and its Client will agree in writing that that selected Program Sponsor will manage the Client's account on a discretionary basis.

TWM will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will TWM accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

Financial Planning and Consulting Services

TWM will typically provide a variety of financial planning services to individuals and families, pursuant to a written agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients 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 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. TWM may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. 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 effect the transaction through the Advisor.

Additionally, TWM provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, annuity, and/or tax advice.

C. Client Account Management

Prior to engaging TWM to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – TWM, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – TWM 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.
- Portfolio Construction – TWM will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – TWM will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

TWM does not manage or place Client assets into a wrap fee program, but may utilize advisory platforms as noted above. Investment management services are provided directly by TWM.

E. Assets Under Management

As of December 31, 2010, the most recent date for which such calculations are provided pursuant to securities regulations, TWM manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$69,600,00
Non-discretionary Assets	\$96,000
Total	\$69,696,000

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 investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of TWM and the Client.

A. Fees for Advisory Services

Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Investment Advisory Fees range from 1.50% to 0.20% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Investment Advisory Fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. Client's fees will be calculated based on the aggregate assets under management with Advisor. The designated Custodian will independently value all securities held in accounts managed by TWM. TWM will not have the authority or responsibility to value portfolio securities.

Financial Planning and Consulting Services

TWM offers financial planning or consulting services on an hourly basis ranging from \$60 to \$250 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Account Portfolio Management

The Custodian will automatically deduct investment Advisory Fees from the Client Account. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with TWM at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting TWM to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services

As noted above, financial planning and consulting fee are invoiced by the Advisor and are due upon receipt.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than TWM in connection with investments made on behalf of the Client. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by TWM is separate and distinct from these custodian and execution fees.

In addition, all fees paid to TWM for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. 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 could invest in these products directly, without the services of TWM, but would not receive the services provided by TWM which are designed, among other things, to assist the Client in determining which products or services are most appropriate to 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 TWM to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Account Portfolio Management

TWM is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with TWM, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

Financial Planning and Consulting Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at anytime by providing written notice to the other party within five (5) days of signing the Advisor's financial planning or consulting agreement. 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. Refunds will be given on a pro-rata basis.

E. Compensation for Sales of Securities

TWM does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

Item 6 – Performance-Based Fees

TWM does not charge performance-based fees for its investment advisory services. The fees charged by TWM are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client. TWM does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

TWM provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Pension and Profit Sharing Plans – retirement plan sponsors or company plans
- Not-for-Profit Entities – charities and other non-profit organizations
- Corporations and Businesses – taxable business entities, investing cash reserves

The relative percentage of each type of Client is available on TWM's Form ADV Part 1. These percentages will change over time. TWM requires a minimum annual fee of \$1,000 and a minimum account size of \$100,000 for Portfolio Management Services clients. The minimum annual fee and the minimum account size may be negotiable under certain circumstances. TWM may group certain related client accounts for the purposes of achieving the minimum account size.

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

A. Methods of Analysis

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

As noted above, TWM generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. TWM 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, TWM 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.

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. TWM 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.

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. 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.

TWM primarily employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. 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.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving TWM or any of its employees. TWM and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **132601** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Wayne Zussman by selecting the Investment Adviser Representative and entering Mr. Zussman's Individual CRD# **3250282** in the field labeled "Individual CRD Number". Information for advisory person is included below in each Form ADV 2B.

Item 10 – Other Financial Activities and Affiliations

TWM also provides tax preparation and consulting services and may offer these services to advisory clients. Clients are under no obligation to utilize the tax preparation or consulting services of TWM to be an advisory client.

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

A. Code of Ethics

TWM has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with TWM. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. TWM and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of TWM associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. TWM has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (866) 880-7500 or via email at support@tritonwm.com.

B. Personal Trading and Conflicts of Interest

TWM allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

At no time, will TWM or any associated person of TWM, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

TWM does not have discretionary authority to select the broker-dealer/ custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize TWM to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, TWM does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where TWM does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and /or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by TWM. TWM may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. TWM does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

TWM typically recommends to Clients that they established their brokerage account[s] at Institutional Services division of Fidelity Brokerage Services LLC ("Fidelity"). Fidelity is an independent and unaffiliated SEC-registered broker-dealer and FINRA member. Fidelity offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. TWM receives some benefits from Fidelity through its participation in the Fidelity Institutional Wealth services Institutional Advisor Program. TWM considers a number of factors in selecting and /or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. TWM is not affiliated with, or related to Fidelity.

TWM reserves the right to decline acceptance of any client account that directs the use of a broker dealer other than Fidelity, if TWM believes that the broker dealer would adversely affect TWM's fiduciary duty to the client and/or ability to effectively service the client portfolio.

A. Recommendation of Custodian[s] – continued

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **TWM does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

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

3. Directed Brokerage - All Clients are serviced on a “directed brokerage basis”, where TWM will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage 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]). In selecting the custodian, TWM 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 designated custodian.

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 order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. TWM will execute its transactions through an unaffiliated broker-dealer selected by the Client. TWM may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. 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 particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Wayne Zussman, Chief Compliance Officer and Managing Principal of TWM. Formal reviews are generally conducted at least annually or more or less 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 or less 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. The Client is encouraged to notify TWM if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or 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 at any time. 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 TWM

TWM is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. TWM does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. TWM may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, TWM may receive referrals of new Clients from a third-party.

B. Client Referrals from Solicitors

TWM does not engage paid solicitors for Client referrals.

Item 15 – Custody

TWM does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct TWM to utilize that custodian for the Client's security transactions. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 – Investment Discretion

TWM generally has 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 TWM. 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 TWM will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

TWM does not accept proxy-voting responsibility for any Client.

Item 18 – Financial Information

Neither TWM nor its management has any adverse financial situations that would reasonably impair the ability of TWM to meet all obligations to its Clients. Neither TWM, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. TWM is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

Item 19 – Requirements for State-Registered Advisors

A. Background of Principal Officer

The Chief Compliance Officer and Managing Member of TWM is Wayne B. Zussman. Mr. Zussman, born in 1959, is a dedicated Portfolio Manager for Client accounts of TWM.

Mr. Zussman earned a Masters of Business Administration from Pace University in Finance. Mr. Zussman earned a Bachelor of Science in Accounting from the State University of New York.

Additional information regarding Mr. Zussman's employment history is included on the following page.

A. Background of Principal Officer - continued

Employer	Time Period
Managing Member and Chief Compliance Officer, Triton Wealth Management, LLC	01/08 – Present
Investment Advisor Representative, Medallion Advisory Services, LLC	2002 – 2007
Registered Representative, Medallion Insurance Services, LLC	2002 – 2007
Insurance Agent, Medallion Insurance Services, LLC	2002 – 2007
Registered Representative, NY Life Securities, Inc.	2001 – 2002

B. Other Business Activities

TWM also provides tax preparation and consulting services and may offer these services to advisory clients. Clients are under no obligation to utilize the tax preparation or consulting services of TWM to be an advisory client.

C. Performance Fee Calculations

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

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding TWM or Mr. Zussman. Neither TWM nor Mr. Zussman has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against TWM or Mr. Zussman

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 TWM or Mr. Zussman.*

However, we do encourage you to independently view the background of Mr. Zussman on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 3250282 in the field labeled "Individual CRD Number".

E. Material Relationship with Issuers of Securities

Neither TWM nor Mr. Zussman has any relationships or arrangements with issuers of securities.

Privacy Policy

Effective: January 1, 2011

Our Commitment to You

TWM is committed to safeguarding the use of your personal information that we have as your Investment Advisor. TWM (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does TWM provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account 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 privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

- Name and address
- E-mail address
- Phone number
- Social security or taxpayer identification number
- Assets
- Income
- Account balance
- Investment activity
- Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That TWM Shares

TWM works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy TWM's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

TWM 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.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy 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. You may obtain a copy of our current privacy policy by contacting us at (866) 880-7500.

Form ADV Part 2B – Individual Disclosure Brochure

for

Wayne Bruce Zussman, MBA, CFP®
President and Chief Compliance Officer

Effective: March 26, 2011

This Brochure Supplement provides information about the background and qualifications of Wayne Bruce Zussman, MBA, CFP® (CRD# 3250282) in addition to the information contained in the Triton Wealth Management, LLC ("TWM") Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the TWM Brochure or this Brochure Supplement, please contact us at (866) 880-7500 or support@tritonwm.com.

Additional information about Mr. Zussman is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

The President and Chief Compliance Officer of TWM is Wayne B. Zussman, MBA, CFP®. Wayne, born in 1959, is a dedicated Portfolio Manager for Client accounts of TWM.

Wayne has over fifteen years of experience in personal wealth management, advising individuals, families, estates and small business owners on a range of investment and financial matters. His primary objective is to understand both the financial and personal goals of each client while developing on-going custom strategies appropriate to those goals and current market conditions.

Wayne has appeared as a guest on CNN's Financial Network television program "Your Money" and has been featured in many publications including the Wall Street Journal, USA Today, Reuters and the Washington Post. Since 2005, Wayne has annually been named one of America's Top Financial Planners by the Consumers' Research Council for America.

Wayne earned his Masters in Business Administration from Pace University and holds a Bachelor of Science in Accounting from the State University of New York. He is an active member of the Financial Planning Association (FPA) and the National Association of Tax Professionals (NATP) and is licensed to use the Certified Financial Planner™ and CFP® marks by the Certified Financial Planner Board of Standards. As a Certified Financial Planner™, Wayne practiced initially with a fee-only financial planning firm in Virginia providing comprehensive financial planning and portfolio management advice to ultra-high net-worth individuals before venturing out on his own to form Zussman Financial Advisors in 2001, the predecessor to Triton Wealth Management.

He currently serves as the treasurer of a breast cancer support network, a coach to his children's various sports activities and as a member of the finance committee within his homeowners association. His community activities have included coaching for Special Olympics and volunteering within the Make-A-Wish and Juvenile Diabetes Foundations.

Additional information regarding Mr. Zussman's recent employment history is included below.

Employer	Time Period
Managing Member and Chief Compliance Officer, Triton Wealth Management, LLC	01/08 to Present
Zussman Financial Advisors:	2001 to 2008
• Investment Advisor Representative, Medallion Advisory Services, LLC	2002 to 2007
• Registered Representative, Medallion Insurance Services, LLC	2002 to 2007
• Insurance Agent, Medallion Insurance Services, LLC	2002 to 2007
• Registered Representative, NY Life Securities, Inc.	2001 to 2002
Investment Advisor Representative, Sullivan, Bruyette, Speros & Blayney	1999 to 2001

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding TWM or Mr. Zussman. Neither TWM nor Mr. Zussman has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against TWM or Mr. Zussman.

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 TWM or Mr. Zussman.*

However, we do encourage you to independently view the background of Mr. Zussman on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 3250282 in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Mr. Zussman is not currently involved in any other for-profit business activities outside of TWM.

Item 5 – Additional Compensation

Mr. Zussman has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations.

Item 6 – Supervision

Mr. Zussman serves as the Managing Member and Chief Compliance Officer of TWM. Mr. Zussman can be reached at the contact information at the bottom of the page.

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

Form ADV Part 2B – Individual Disclosure Brochure

for

Karen L. Baer, CSA

Financial Advisor

Effective: March 26, 2011

This Brochure Supplement provides information about the background and qualifications of Karen L. Baer (CRD# 1375762) in addition to the information contained in the Triton Wealth Management, LLC ("TWM") Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the TWM Brochure or this Brochure Supplement, please contact us at (866) 880-7500 or at support@tritonwm.com.

Additional information about Ms. Baer is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Karen L. Baer, CSA, born in 1965, is a dedicated Financial Advisor for Client accounts of TWM. Karen started in the financial services industry in 1986 on the ground floor—literally. Beginning in the mailroom of Texas based Southmark Financial Services, she continued to pursue her goal of becoming a Financial Advisor through the same personal determination and strong work ethic that she currently brings to each of her clients. Karen's unique, fresh approach to financial portfolio management comes from her deep understanding of all aspects of the industry along with her dedication to her clients. Self-directed and highly motivated, Karen provides her clients with a level of service that is unrivaled and she always welcomes the opportunity to assist her clients with all aspects of their lives. Karen is located in our Chester office and primarily serves clients throughout Anne Arundel County and Maryland's Eastern Shore.

Karen is a devoted wife, mother and community activist. Her current community interests include serving on the Board of Directors of the Chesapeake Women's Network as well as on the Board of Crossroads Community, Inc. Additional community activities include leading her son's Cub Scout Den as Den Leader and mentoring a number of clients from the Crossroads Community. Karen lives outside of Centreville, MD on a working farm with her husband Bob and family. She also assists Bob with his farm work, growing produce and raising cattle.

Additional information regarding Ms. Baer's recent employment history is included below.

Employer	Time Period
Financial Advisor, Triton Wealth Management, LLC	05/2010 to Present
Financial Advisor, LPL Financial, Inc.	1997 to 2010

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding TWM or Ms. Baer. Neither TWM nor Ms. Baer has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against TWM or Ms. Baer.

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 TWM or Ms. Baer.*

However, we do encourage you to independently view the background of Ms. Baer on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **1375762** in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Ms. Baer is not currently involved in any other business activities outside of TWM, other than periodic assistance with the operation of a working farm where she resides.

Item 5 – Additional Compensation

Ms. Baer does not receive any additional compensation from any other business activities.

Item 6 – Supervision

Ms. Baer serves as a Financial Advisor and Compliance Manager for TWM, under the supervision of TWM's President and Chief Compliance Officer, Wayne Zussman. Ms. Baer can be reach at the contact information at the bottom of the page.

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

Form ADV Part 2B – Individual Disclosure Brochure

for

Paula A. Landau

Effective: March 26, 2011

This Brochure Supplement provides information about the background and qualifications of Paul A. Landau (CRD# 1372223) in addition to the information contained in the Triton Wealth Management, LLC (“TWM”) Brochure. If you have not received a copy of this Brochure or if you any questions about the contents of the TWM Brochure or this Brochure Supplement, please contact us at (866) 880-7500 or at support@tritonwm.com.

Additional information about Ms. Landau is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Paula A. Landau, born in 1963, is a dedicated Financial Advisor for Client accounts of TWM. Paula counsels Clients on asset allocation and investment strategies, and aligns their financial plan to ensure long and short term goals are met. Paula takes pride in understanding the personal needs of the Clients she serves. She specializes in cash flow analysis, helping Clients face times of transition with confidence and ease. Her goals are met by working with a company that provides a holistic approach to its clients and serves the broader community.

Paula has over 18 years of experience in the financial services industry. She began her career as a Research Assistant at T. Rowe Price working with the analysts and traders; learning from the inside how a mutual fund company works. She subsequently worked with high net worth individuals for ten years at Alex. Brown & Sons. After a sabbatical to raise her children, she returned to working with high net worth individuals at a Fee-Only firm in Chevy Chase, MD before joining Triton Wealth Management. She is currently enrolled in the Certified Financial Planner™ (CFP®) Education Program and is a member of the Financial Planning Association (FPA). Paula is married to Jim Landau and the mother of Andrew and Megan. In her spare time she enjoys visiting art museums and taking hikes with her family.

Additional information regarding Ms. Landau's recent employment history is included below.

Employer	Time Period
Financial Advisor, Triton Wealth Management, LLC	01/2011 to Present
Client Relations Manager, Freed Advisors	01/2008 to 01/2011
Investment Management Specialist, Freed Meyers	06/2006 to 11/2007
Administrative Associate, LPL Financial, Inc.	09/2005 to 06/2006

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding TWM or Ms. Landau. Neither TWM nor Ms. Landau has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against TWM or Ms. Landau.

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 TWM or Ms. Landau.*

However, we do encourage you to independently view the background of Ms. Landau on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **1372223** in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Ms. Landau is not currently involved in any other business activities outside of TWM.

Item 5 – Additional Compensation

Ms. Landau does not receive any additional compensation from any other business activities.

Item 6 – Supervision

Ms. Landau serves as an Financial Advisor for TWM, under the supervision of TWM's President and Chief Compliance Officer, Wayne Zussman. Ms. Landau's contact information is included on the cover of this Brochure Supplement.

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