

Form ADV Part 2A

Last Updated: February 6, 2013

Trinity Capital Management, LLC

SEC File Number: 801- 67581

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This brochure provides information about the qualifications and business practices of Trinity Capital Management, LLC ("TCM"). If you have any questions about the contents of this brochure, please contact Fredric B. Fisher at (805) 963-0500 and/or [via Fred@trinitycapmgt.com](mailto:Fred@trinitycapmgt.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about TCM also is available on the SEC's website at www.adviserinfo.sec.gov.

Although TCM may use the term "registered investment adviser" or use the term "registered" through this Form ADV Part 2A, the use of these terms is not intended to imply a certain level of skill or training.

Annual Update

The Material Changes section of this brochure will be updated annually and/or when material changes occur since the previous release of TCM's Brochure. A summary of changes is necessary to inform clients of any substantive changes to TCM's policies, practices or conflicts of interests so that they can determine whether to review the brochure in its entirety or to contact TCM with questions about the changes.

Material Changes since Last Update

The following is a list of material changes since the last update:

- Change of address from 1334 Anacapa Santa Barbara, CA 91303 to 607 De La Vista Ave. Santa Barbara, CA 93103

March 31, 2013 is the final compliance date for all advisers with fiscal year ending December 31, 2012. Filing via IARD must be made within 90 days of the end of each adviser's fiscal year end.

Full Brochure Available

Clients who would like to receive a complete copy of our Firm Brochure, please contact us by telephone at (805) 963-0500 or by fax (805) 299-1868. TCM does not maintain a website at this time.

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Advisory Business

Trinity Capital Management, LLC ("TCM"), is an investment advisor registered with the Securities and Exchange Commission (SEC) and was established in 2006 to provide portfolio management services to its own clients and clients of other registered investment adviser firms, in addition to providing investment advisory services to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, and/or corporations (herein referred to as "Client" or "Clients").

Principal Owners

For the purpose of this section, TCM lists its principal owners as any person directly owning 25% or more of TCM as disclosed on Schedule A of Part 1A as of date of the last update filing.

TCM's principal owners are as follows:

Fredric Brian Fisher is a direct owner of TCM with more than 40% ownership.

Name: Fredric B. Fisher, CFP®
Date of Birth: 1970
Education: Westmont College; B.A in Economics/Business (1991)
Background: Trinity Capital Management, LLC; Managing Member (09/06-Present)
Financial Network Investment Corp, Registered Rep (11/07 -08/09)
CFIS, Inc. (dba: Trinity Financial Partners); Financial Advisor (01/04 - Present)
Financial Network Investment Corp, Inc., Registered Rep (11/07 -08/09)
NFPSP, Inc.; Registered Rep (06/05-11/07)
Mercer Global Advisors; Financial Advisor (07/99 -12/03)
Artisan Foods; Controller (01/96-07/99)
Designations: Certified Financial Planner (CFP ®)
Licenses: Series 66

James Lee Fisher is a direct owner of TCM with more than 40% ownership.

Name: James Lee Fisher
Date of Birth: 1944
Education: Calvin College; Degree in History & Psychology (1966)
Background: Trinity Capital Management, LLC; Member (09/06-Present)
CFIS, Inc. (dba: Trinity Financial Partners); Owner/President (04/78-Present)
Designations: Chartered Financial Consultant (ChFC); Chartered Life Underwriter (CLU)
Licenses: *Series 7 equivalent

TCM is not a publicly held company and no part of TCM is owned by an individual or company through any subsidiaries or "intermediate subsidiaries."

Investment Advisory Services (Portfolio Management)

Under a portfolio management program, TCM offers Clients certain investment advisory services as covered in the Investment Management Agreement ("IMA") where each Client's investment account and/or portfolio is managed on a continuous basis. TCM may assist Client in determining, among other things, suitability, investment objectives, goals, time horizons, and risk tolerances. Advisory services include but are not limited to the following:

- Designing and implementing ladder bond portfolios
- Designing and implementing equity mutual fund portfolios
- Managing individual stock/bond portfolios.

TCM offers Clients investment advisory services as covered in the Investment Advisory Agreement ("IAA") where each Client may receive specific investment related services. TCM may assist Client in determining, among other things, suitability, investment objectives, goals, time horizons, and risk tolerances.

Financial Planning Services

TCM may offer financial planning services to include comprehensive or segmented (limited) financial plans, investment plans, and/or individual consultations regarding a Client's financial affairs. The design and

implementation of a financial plan may begin with the process of gathering data regarding income, expenses, taxes, insurance coverage, retirement plans, wills, trusts, investments and/or other relevant information pertaining to a Client's overall financial situation. This information is carefully analyzed taking into account a Client's goals and stated objectives and a series of recommendations and/or alternative strategies will be developed and designed to achieve optimum overall results. Fees for such services will be on a flat fee (per plan) or an hourly rate (see Fees and Compensation below).

Termination of Account

Clients who wish to terminate their account must notify TCM verbally within five (5) business days of its execution with written notice to follow within the next twenty-four (24) hours. If services are terminated within (5) business days of executing the client agreement, services will be terminated without penalty. After the initial five (5) business days, the client may be responsible for payment of fees for the number of days services are provided by TCM prior to receipt of the notice of termination.

TCM may tailor its advisory services to the specific needs and objectives of each advisory client. Clients may also impose restrictions on investing in certain securities or types of securities. Most of which is generally covered in the client's investment advisory agreement or financial planning agreement.

TCM does not participate in a wrap fee program at this time.

As of December 31, 2012, the amount of client assets under advisement is calculated as follows:

Discretionary:	\$134,000,000.00 (414 Accounts)
Non-discretionary:	\$000,000,000.00 (Not Applicable)

TCM's method for computing the amount of "*client* assets you manage" is the same method for computing "assets under management." The amount as disclosed above is rounded to the nearest \$100,000. The date of the calculation above is not more than ninety (90) days before the date TCM last updated its *brochure*.

Fees and Compensation

Depending on the specific advisory services, fees may be based on a percentage of assets under management or fixed fees. Additionally, Fees are not collected for services to be performed more than six (6) months in advance. The Adviser does not have custody of client's funds or securities.

Generally, fees are payable quarterly, in arrears, based upon the Client's account balance on the last business day of the quarter. A pro rata fee adjustment is used to handle billing on deposits and withdrawals made throughout the quarter. If an account is closed, the Client will receive a final bill based on the same method for the number of days under management for that quarter.

Investment Management Fees

TCM Portfolio Management Program fees based on assets under management are as follows:

Fees, noted as annual percentages, will be charged based on the market value of the portfolio by program type.

Cash Management	0.10%
Equity and Fixed Income	0.30%
Custom Money Market	0.40%

TCM may offer Clients direct investment advisory services in addition to, and including, the portfolio management services referenced above as covered in the Investment Management Agreement ("IMA") under the fee structure referenced in the table below.

Fees are charged based on the market value of the assets under management.

TCM utilizes a tiered structure. Each dollar that falls within a particular tier is billed at that rate.

From	To	Annual Fee (%)
0	500,000	1.20%
500,000	2,000,000	0.80%
2,000,000	5,000,000	0.60%
5,000,000	10,000,000	0.50%
10,000,000	+	0.45%

Financial Planning Fees

In consideration of financial planning services as provided by TCM, Client shall agree to pay TCM an hourly or flat fee depending on the type of financial planning services offered. Factors that may affect pricing include whether financial planning services are for an individual or corporation, or if such services are considered comprehensive or segmented (limited), investment plans, and/or individual consultations regarding a Client's financial affairs.

Fees for financial planning services that are charged on an hourly basis at the hourly rate of the individual financial planner offering such services shall be disclosed and agreed upon prior to signing a financial planning or investment management agreement. Fees for financial planning services that are charged on a flat rate may require fifty percent (50%) of total fee due in advance. Client agrees that the remainder of the fee is due upon completion of the services.

All fees, refund policies, termination provisions and other relevant disclosures as they relate to financial planning services are disclosed in a separate financial planning agreement, which is given to the Client prior to, or at the time of entering into such agreement. Each Client will receive a copy of Form ADV Part 2A/B, the financial planning agreement and other relevant disclosure documents as required by law from TCM.

In the event the Client chooses financial planning services, TCM shall not be compensated on the basis of a share of capital gains upon, capital appreciation of the funds, or any portion of the funds of Client except as may be authorized by the appropriate federal or state securities regulatory authority.

Performance-Based Advisor Fees

Neither TCM or any of its *supervised persons* accepts *performance-based fees* – that is, fees based on a share of capital gains on or capital appreciation of the assets of a *client* (such as a *client* that is a hedge fund or other pooled investment vehicle). Therefore, there are no conflicts of interest that TCM or its *supervised persons* may face by managing these accounts at the same time, to include any incentive to favor accounts for which TCM or its *supervised persons* receive a *performance-based fee*.

Types of Clients

TCM is an investment adviser firm registered with the Securities and Exchange Commission (SEC) and provides portfolio management and investment advisory services to its own clients and clients of other registered investment adviser firms, in addition to providing investment advisory services to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, and/or corporations (herein referred to as "Client" or "Clients").

Requirement for Opening Accounts (Minimum Investment Amount)

TCM's fee range for each particular service is subject to negotiation and could vary depending upon various circumstances, including the scope of the services to be provided (the minimum fees and fee ranges for existing clients prior to current calendar year may differ from those indicated).

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

TCM employs asset allocation under the modern portfolio theory as a primary method of analysis.

Investing in securities involves risk of loss that you as our client should be prepared to bear.

Use of Significant Investment Strategy

TCM employs highly disciplined investment strategies which provide exposure to the risks and commensurate returns of fixed income and global equity markets.

TCM's primary strategy in fixed income portfolios is a laddered bond structure. Client situations may also require the utilization of other strategies, such as targeted maturity dates.

TCM's primary investment strategy for equity exposure is a globally diversified basket of nearly all publicly traded companies with tilts toward small and value stocks. Client needs may dictate alternate strategies which would be contained in the Investment Policy Statement.

TCM does not recommend any particular type of security as part of its overall investment advisory services.

Disciplinary Information

Disclosure Events

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which TCM or its management personnel are involved.

There are no disclosure events involving an administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which TCM or its management personnel are involved.

There are no disclosure events involving A *self-regulatory organization (SRO) proceeding* in which TCM or its management personnel are involved.

Other Financial Industry Activities and Affiliations

Broker/Dealer Affiliation

Though none currently are, management persons of TCM may also be licensed as securities salespersons for a broker/dealer. In that case, those principals and associated persons who are also registered representatives with a broker/dealer may recommend securities products or provide other services to its Clients for a commission. This could present a potential conflict of interest as certain registered representatives of TCM could receive concessions, commission and/or fees if the client chooses to implement recommendations made in their capacity as registered representatives. However, the client is under no obligation to purchase products that TCM may recommend, or to purchase products through TCM.

Neither TCM nor any of its *management persons* are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

On occasion, TCM and its *management persons* may own securities products that he also recommends to

clients which may present a potential conflict of interest. However, as a preventative measure, all client transactions will be conducted and implemented before any such transaction relating to any personal accounts of any affiliated persons of TCM. In addition to this measure, all of the aforementioned *management persons* of TCM will act in accordance with applicable securities laws and conduct their business to ensure overall compliance with Insider Trading rules and the Securities Fraud Enforcement Act of 1988.

In the event the client chooses to purchase investment products through TCM's *management persons*, in their individual capacities as registered representatives, they may receive brokerage commissions to effect securities transactions. The brokerage commissions charged by TCM may be higher or lower than those charged by other broker-dealers.

TCM has arrangements that are material to its advisory business or its clients with a related person who is an investment adviser. More specifically, James Lee Fisher, as the owner of Trinity Capital Management, is also the owner/president of CFIS, Inc. (dba: Trinity Financial Partners), an SEC registered investment adviser. However, TCM **does not** recommend or select other investment advisers for its *clients* or receive compensation directly or indirectly from those advisers as a result of such a recommendation or selection by TCM.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding the Adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Code of Ethics, Participation/Interest in *Client* Transactions and Personal Trading

Code of Ethics

TCM has adopted the following Code of Ethics in accordance with SEC rule 204A-1 or similar state rules:

- **Fiduciary Responsibility-** TCM and its staff shall exercise the highest standard of care in protecting and promoting the interests of its clients, and will provide a written disclosure containing any conflicts of interest that may compromise their impartiality or independence. As fiduciary, TCM shall not accept any referral fees or compensation that is contingent upon the purchase or sale of any financial product.
- **Integrity-** All professional services shall be rendered with the highest level of integrity.
- **Objectivity-** TCM and its staff shall provide advice that is objective and in the best interest of the client and without conflicts of interest.
- **Competence-** TCM and its staff shall maintain the necessary knowledge and skills to provide our clients with competent advice and services.
- **Fairness-** All professional services shall be performed by TCM and its staff in a manner that is fair and reasonable to its clients.
- **Confidentiality-** TCM and its staff shall maintain and safeguard all confidential client information in accordance with applicable laws.

- Diligence- TCM and its staff shall ensure the accuracy and completeness of records, information, and data collected, used and managed, and will take necessary steps to correct any discrepancies.
- Regulatory Compliance- TCM and its staff shall comply fully with appropriate laws and internal regulations.

TCM will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Participation/Interest in Client Transactions

Neither TCM nor any of its *related persons* recommend to *clients*, or buys or sells for *client* accounts, securities in which TCM or a *related person* has a material financial interest including but not limited to incidents where TCM or a *related person*, as principal, buys securities from (or sells securities to) TCM *clients*; TCM or a *related person* acts as general partner in a partnership in which TCM solicit *client* investments; or TCM or a *related person* acts as an investment adviser to an investment company that TCM recommends to *client*.

TCM and its *related persons* may buy or sell securities for *client* accounts, at or about the same time that TCM or any of its *related persons* buy or sell the same securities for TCM's own (or the *related person's* own) account. However, as a preventative measure, all Client transactions will be conducted and implemented before any such transaction relating to any personal accounts of any affiliated persons of TCM. In addition to this measure, all of the aforementioned advisory representatives of TCM will act in accordance will applicable securities laws and conduct their business to ensure overall compliance with Insider Trading rules and the *Securities Fraud Enforcement Act of 1988*.

TCM and its *related persons* may buy for itself securities it also recommends to clients. However, as a preventative measure, all Client transactions will be conducted and implemented before any such transaction relating to any personal accounts of any affiliated persons of TCM. In addition to this measure, all of the aforementioned advisory representatives of TCM will act in accordance will applicable securities laws and conduct their business to ensure overall compliance with Insider Trading rules and the *Securities Fraud Enforcement Act of 1988*.

Brokerage Practices

Research and Other Soft Dollar Benefits

TCM does not receive research (both proprietary or non-proprietary) or other products or services other than execution services from a broker/dealer or a third party in connection with *client* securities transactions, otherwise known as "soft dollar benefits".

Brokerage for Client Referrals

TCM has limited discretion over the selection of brokers to be used and the commission rates to be paid. While commission rates are an important factor in broker selection, TCM may select brokers that charge commissions higher than those obtainable from other brokers. In selecting a broker for any transaction or series of transactions, TCM may consider a number of factors in addition to commission rates, including, for example net price, reputation, financial strength and stability, efficiency of execution and error resolution, block trading and block position capabilities, willingness to execute related or unrelated difficult transactions in the future, order of call, on-line access to computerized data regarding client accounts, the availability of stocks to borrow for short trades, custody, record keeping or other similar services, as well as other matters involved in the receipt of general brokerage services.

Directed Brokerage

Regarding directed brokerage arrangements, TCM does not recommend, request or require that *clients* direct TCM to execute transactions through a specified broker-dealer.

Aggregation of Client Orders

Under certain circumstances, TCM may aggregate the purchase or sale of securities for various client accounts.

Review of Accounts

Advisory clients of TCM are managed and reviewed on a continuous basis. Overall investment management, market prospects and individual issue prospects are considered in the review process. Triggering factors that may affect an account review could be any material change in a client's account including but not limited to (i) a change in a client's financial situation; (ii) rebalancing required to maintain the asset class integrity of the portfolio; or (iii) changes in a fund or security used to represent an asset class. Account reviews are conducted by the designated investment adviser professional(s) who is primarily responsible for such accounts.

Client reports are individualized. The nature and frequency are determined by client need and the services offered. However, most TCM Clients will receive quarterly or annual reports summarizing the portfolio structure and investment performance of their account(s).

Client Referrals and Other Compensation

Receipt of Economic Benefit (non-client)

TCM does not receive an economic benefit for providing investment advice or other advisory services from someone who is not a client.

Direct/Indirect Compensation for Client Referrals

Neither TCM nor any of its related persons directly or indirectly compensate any person who is not its supervised person for client referrals.

Custody

TCM does not maintain custody of client funds and/or securities. Clients will receive their monthly and/or quarterly account statements directly from the designated broker/dealer, bank or other qualified custodian of record and should carefully review those statements for accuracy. In the event that clients also receive account statements from TCM, it strongly encourages each client to compare the account statements they receive from the qualified custodian with those received from TCM.

Investment Discretion

Upon receiving written authorization from a client, TCM may manage client assets on a limited discretionary basis. In this case, Client delegates to TCM limited discretionary trading authorization with respect to the purchase, exchange and sale of actively traded equity and equity-related securities in addition to the amount of securities to be bought or sold on behalf of the Client. Client may also hereby appoint one or more advisory representatives of TCM as a representative of TCM as agent and attorney in fact to purchase, sell and trade such securities, waivers, consents and other instruments with respect to such securities.

Voting Client Securities

TCM has the authority to vote client proxies. Clients may contact TCM directly at (805) 963-0500 if they have any questions regarding a particular solicitation. Information regarding our specific voting strategy can be obtained by calling TCM or e-mailing Fred Fisher at fred@trinitycapmgt.com.

Financial Information

Pre-Payment of Fees

TCM does not require or solicit prepayment of fees.

Material Impact of Discretionary Authority

TCM may exercise *discretionary authority* over certain *client* funds or securities. However, TCM does not anticipate any financial condition that may be reasonably likely to impair its ability to meet contractual commitments to *clients* at this time.

Custody Disclosure

TCM does not have custody of client funds or securities. Please see Custody section above for further details.

Bankruptcy Disclosure

TCM has not been the subject of a bankruptcy petition at any time during the past ten years.

Privacy Policy

Privacy Policy Notice

Your privacy is important to us. Your personal information is kept secure. Under federal and state law, you have a right to know what information is being collected about you and how that information will be used. TCM collects nonpublic personal information about you from the following sources:

- Information TCM receives from you on applications or other forms.
- Information about your transactions with TCM; and
- Information that you specifically have had your other professional advisors forward to TCM.

TCM does not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as directed by you:

- Under law, the information TCM collects is provided to companies that perform support services on our behalf as necessary to effect, administer, or process a transaction, or for maintaining and servicing your account;
- As directed by you, TCM will be working with your other professional advisors and TCM will provide information in our possession that is reasonably requested by the other advisors.

TCM does not give or sell information about you or your accounts to any other company, individual or group. TCM restricts access to nonpublic personal information about you to those employees who need to know that information to provide services to you. TCM maintains physical, administrative, and technical procedural safeguards to protect your nonpublic personal information. You do not need to call or do anything as a result of this notice. It is meant to inform you of how TCM safeguards your nonpublic personal information.

Form ADV Part 2B: Brochure Supplement

Last Updated: July 25, 2012

Supervised Persons:

Fredric Brian Fisher

James Lee Fisher

Andrew Yoon Bucher

Trinity Capital Management, LLC

607 De La Vista Ave.

Santa Barbara, CA 93103

Phone (805) 963-0500

Fax (805) 299-1868

This brochure supplement provides information about the Supervised Persons listed above that supplement TCM's brochure. You should have received a copy of that brochure. Please contact Fredric B. Fisher at (805) 963 -0500 and/or via email at Fred@trinitycapmgt.com if you did not receive TCM's brochure or if you have any questions about the contents of this supplement.

Additional information about TCM is also available on the SEC's website at www.adviserinfo.sec.gov or its own website at www.FIRMNAME.com.

Educational Background and Experience

TCM requires certain licensing standards as well as a certain level of business experience for giving investment advice to clients. For example, all advisers must be professionals with relevant industry experience in order to adequately demonstrate a certain level of expertise in securities management and analysis. TCM requires that all investment adviser representatives maintain the minimum licensing qualifications in accordance with all federal, state, and self-regulatory organization (SRO) rules and regulations.

The following is a list of *supervised persons* at TCM:

Name: Fredric B. Fisher, CFP®
Date of Birth: 4/19/1970
Education: Westmont College; B.A in Economics and Business (1991)
Background: Trinity Capital Management, LLC; President, Managing Member (09/06-Present)
CFIS, Inc. (dba: Trinity Financial Partners); Financial Advisor (01/04- Present)
Financial Network Investment Corp, Inc.; Registered Rep (11/07-08/09)
NFPPI, Inc.; Registered Rep (06/05-11/07)
Mercer Global Advisors; Financial Advisor (07/99-12/03)
Artisan Foods; Controller (01/96-07/99)
Designations: Certified Financial Planner (CFP ®)
Licenses: Series 66

Name: James L. Fisher
Date of Birth: 10/18/1944
Education: Calvin College; Degree in History & Psychology (1966)
Background: Trinity Capital Management, LLC; Member (09/06-Present)
CFIS, Inc. (dba: Trinity Financial Partners); Owner/President (04/78-Present)
Designations: Chartered Financial Consultant (ChFC); Chartered Life Underwriter (CLU)
Licenses: *Series 7 equivalent

Name: Andrew Y. Bucher, CFA®
Date of Birth: 4/12/1979
Education: Evergreen State College; B.A (2002)
Background: Trinity Capital Management, LLC; Portfolio Manager (09/06-Present)
CFIS, Inc. (dba: Trinity Financial Partners); Portfolio Manager (01/06- 09/06)
Mercer Global Advisors; Senior Trader (04/03-12/05; 01/02-09/02)
Designations: Chartered Financial Analyst® (CFA®)
Licenses: Series 65

Disciplinary Information

There are no disclosure events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which TCM or its personnel are involved.

There are no disclosure events involving an administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which TCM or its personnel are involved.

There are no disclosure events involving A *self-regulatory organization (SRO) proceeding* in which TCM or its personnel are involved.

If this supplement is delivered electronically, and any supervised person under the firm has a disciplinary history, the details of any disclosure may be found on either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system (www.finra.org/brokercheck) or the IAPD (www.adviserinfo.sec.gov).

There is no other *proceeding* in which a professional attainment, designation, or license of any of the supervised persons as part of this Brochure Supplement was revoked or suspended because of a violation of rules relating to professional conduct, nor were there any incidents where any of the supervised persons as part of this Brochure Supplement resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a *proceeding*.

Other Business Activities

Other Related Investment Business

None of TCM's *supervised person(s) listed above* is actively engaged in any *investment-related* business or occupation, including if the *supervised person* is registered, or has an application pending to register, as a futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated *person* of an FCM, CPO, or CTA.

TCM has arrangements that are material to its advisory business or its clients with a related person who is an investment adviser. More specifically, James Lee Fisher, as the owner of Trinity Capital Management, is also the owner/president of CFIS, Inc. (dba: Trinity Financial Partners), an SEC registered investment adviser.

Other Business Activity

Supervised Persons of TCM are not currently, but may also be licensed as securities salespersons for a broker/dealer. As such, those Supervised Persons who are also registered representatives with a broker/dealer may recommend securities products or provide other services to its Clients for a commission. This could present a potential conflict of interest as certain registered representatives of TCM could receive concessions, commission and/or fees if the client chooses to implement recommendations made in their capacity as registered representatives. However, the client is under no obligation to purchase products that TCM may recommend, or to purchase products through TCM. All material conflicts of interest are disclosed regarding IARs and/or TCM which could be reasonably expected to impair the rendering of unbiased and objective advice.

Additional Compensation

None of the supervised persons listed above as part of this Brochure Supplement receive any "economic benefit" as that term is defined (e.g. *sales awards and other prizes*) from a non-client for providing advisory services.

Supervision

Fredric B. Fisher is the designated supervisor for TCM responsible for providing supervisory oversight regarding TCM's advisory business. Fredric B. Fisher's contact information is (805) 963-0500. All supervision is performed on a regular and continuous basis where all transactional activity is reviewed and approved by Fredric B. Fisher as well as a review of ongoing management of investment advice and financial planning.