

Item 1 Cover Letter

DAVID P. TUPAJ
PARTUM CAPITAL LLC
PART 2B BROCHURE SUPPLEMENT

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This brochure supplement provides information about David P. Tupaj that supplements the Partum Capital brochure. You should have received a copy of that brochure. Please contact info@partumcapital.com if you did not receive Partum Capital's brochure or if you have any questions about the contents of this supplement.

Additional information about David P. Tupaj is available on the SEC's website at <https://adviserinfo.sec.gov/>.

Item 2 Educational Background and Business Experience

Educational Background:

United States Air Force Academy, Colorado Springs, CO, BS Economics, 1992

Texas A&M University, College Station, TX, BS Meteorology, 1993

Arizona State University, Tempe, AZ, MBA, 2002

Business Experience:

07/2021 - Current	Partum Capital, Chief Investment Officer
12/2020 - 06/2021	Raymond James, Financial Adviser
12/2020 – 06/2021	Laguna Wealth Services, Financial Adviser
11/2018 - 10/2020	Ed Rachal Foundation, Property Asset Manager
01/2017- 10/2018	Iron Horse Tools, Manager

Item 3 Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Mr. Tupaj has no such disciplinary information to report.

Item 4 Other Business Activity

Mr. Tupaj is a certified public accountant (CPA) operating under the CPA firm name David P Tupaj, CPA providing financial consulting services including financial planning. **Conflict of Interest:** The business consulting and advisory activities of Mr. Tupaj provided from time to time create potential for material conflicts of interest for clients of both Partum Capital and the CPA firm if he provides investment advice or recommends investment products, activities which are outside the scope of his practice. David Tupaj does not provide financial planning or investment advice to his CPA clients. Clients are reminded that they may purchase investment products and services recommended by the Registrant through other, non-affiliated advisers. The relationship will be acknowledged in writing by the CPA firm client prior to providing investment advisory services through Partum Capital.

Item 5 Additional Compensation

Mr. Tupaj may receive compensation from product sponsors or vendors. Compensation may include gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement with educational or training events or marketing or advertising initiatives. Such compensation shall not be tied to the sale of any product.

Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act ("Act"). Partum Capital's Chief Compliance Officer is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Partum Capital at cco@partumcapital.com or 361.510.5941.