

**Item 1 - Cover Page**

Registered as: Drawbridge Capital, LLC | CRD No.128636



Doing Business As: Drawbridge Capital & Drawbridge Asset Management

**Tierney Gorham**  
**CRD No. 5105199**

7134 South Yale Avenue – Suite 700 | Tulsa, Oklahoma 74136  
(918) 493-4190 – Phone  
(918) 493-6536 - fax

<http://www.drawbridge.capital>

**March 2022**

This brochure supplement provides information about your Investment Advisor Representative that supplements the Drawbridge Capital disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Drawbridge Capital, an investment advisor firm. Please contact Drawbridge Capital at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

**Tierney Gorham**

Year of birth:

### **Education**

The following information details your Investment advisor representative's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Investment advisor representative attended the institution but did not attain a degree.

### **Business Experience**

The following information details your Investment advisor representative's business experience for at least the past 5 years.

Drawbridge Capital, LLC: Financial Advisor  
2/28/2022 - PRESENT

Regent Financial Services, Inc.; Financial Advisor  
Xx/xx/xxxx - PRESENT

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

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person 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 broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

### **Insurance Licensed Registered Representative**

Your financial advisor is also a broker or registered representative of LPL Financial and may

receive commissions and other types of compensation for the sale of securities. The potential for the receipt of commissions may give a broker an incentive to recommend investment products based on the compensation received, rather than on the client's needs. However, your financial advisor may only recommend securities that he or she believes are suitable for you. If you have any questions regarding the compensation your financial advisor receives when recommending a security, you should ask your financial advisor. You are under no obligation to purchase investments through your financial advisor.

#### **Item 5 - Additional Compensation**

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Your investment advisor representative may receive economic benefits from persons other than clients in connection with advisory services. Your investment advisor representative provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts.

However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees) payable to LPL Financial. However, when your investment advisor representative provides investment advisory services, it is as a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your investment advisor representative may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Your investment advisor representative receives compensation as a result of your participation in LPL Investment advisor representative programs. LPL Financial shares a portion of the account fee you pay with your advisor, which may be more than what would have been received at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay your advisor in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Investment advisor representative programs. Therefore, the amount of this compensation may be more than what

would be received if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, your advisor may have a financial incentive to recommend an advisory program over other programs and services. However, your advisor may only recommend a program or service that is believed to be appropriate for you.

#### **Item 6 - Supervision**

This section explains how Drawbridge Capital supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Drawbridge Capital maintains a supervisory structure and system reasonably designed to prevent violations of applicable rules and regulations. Your Advisors securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your investment advisor representative, for example, with respect to asset allocation, concentration, and account activity. The Chief Compliance Officer is responsible for administering the Drawbridge Capital policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. The Chief Compliance Officer can be reached at (918) 493-4190.

#### **Item 7 - Requirements for State-Registered Advisers**

In addition to the events listed in Item 3 of Part 2B, if the supervised person has been involved in one of the events listed below, disclose all material facts regarding the event. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions;
- (c) ) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) ) dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions;
- (c) ) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) ) dishonest, unfair, or unethical practices.

If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

William A. Riedel has not been involved in any of the above listed events or the subject of a bankruptcy petition.