

Item 1 Cover Page
Wrap Fee Program Brochure

Tripletail Wealth Management
224 E. Marks St.
Orlando, FL 32803

www.TripletailWealth.com

March 14, 2022

This wrap fee program brochure provides information about the qualifications and business practices of Tripletail Wealth Management. If you have any questions about the contents of this brochure, please contact us at (407) 286-4072. 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 Tripletail Wealth Management also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

This is a new brochure and there has not been a previous annual update. Therefore, there are no changes to report.

Item 3 Table of Contents

Item 1 Cover Page	1
Item 2 Material Changes.....	2
Item 3 Table of Contents	3
Item 4 Services, Fees and Compensation	4
Item 5 Account Requirements and Types of Clients	6
Item 6 Portfolio Manager Selection and Evaluation.....	6
Item 7 Client Information Provided to Portfolio Managers.....	8
Item 8 Client Contact with Portfolio Managers.....	8
Item 9 Additional Information.....	9

Item 4 Services, Fees and Compensation

Advisory Services

Tripletail Wealth Management's ("Tripletail" or "Advisor") principal service is providing fee-based investment advisory services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client's objectives. The Advisor's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor may use any of the following to accomplish this objective: exchange listed securities, over-the-counter securities, foreign securities, corporate debt securities, municipal securities, United States government securities, CDs, variable life insurance, variable annuities, mutual funds, options in securities, interests in partnerships investing in real estate, and private placement offerings. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager's tenure, and/or overall career performance. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor 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 position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

Asset Management Fees

Pursuant to an investment advisory contract signed by each client, the client will pay Tripletail an annual management fee, payable quarterly in advance, based on the value of portfolio assets of the account managed by the Advisor as of the opening of business on the first business day of each quarter. New account fees will be prorated from the inception of the account to the end of the first quarter.

Assets Under Management:	Annual Fee:
First \$2 million	1.35 %
Next \$2 million	1.10 %
\$4,000,001 to \$6 million	0.95%
\$6,000,001 to \$10 million	0.85 %
\$10,000,001 to \$15 million	0.75 %
\$15,000,001 to \$25 million	0.65 %
Over \$25 million	0.55 %

Fees will be calculated on a breakpoint schedule. These fees may be negotiated at the sole discretion of the Advisor. Asset management fees will be directly deducted from the client account on a quarterly basis by the qualified custodian. The client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian, and the custodian will send a statement at least quarterly to the client. The custodian will send a statement at least quarterly to the client outlining the time period covered and the amount withdrawn from the client account.

Clients whose assets are invested in a private placement offering will be charged a fixed annual fee of 1.35%, payable quarterly in advance, based on the fair market value of the investment as of the first business day of the calendar year. New investment fees will be prorated from the date of initial investment to the end of the calendar year. These fees may be negotiated by Tripletail at its sole discretion. The client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian, and the custodian will send a statement at least quarterly to the client. Where it is not practical to deduct fees directly from the client account, the client will be sent an invoice at the beginning of each quarter. The invoice is payable upon receipt.

All fees paid to Tripletail for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee and other fund expenses.

At no time will Tripletail accept or maintain custody of a client's funds or securities except for authorized fee deduction. The Advisor's management fee will include all costs charged by the executing broker-dealer and they will be paid by the Advisor. This method is typically characterized as a "wrap fee," where the management fee includes the investment advisory services as well as all transaction costs and the client pays only that management fee and no other costs concerning the trading of the account. Generally, clients in wrap fee accounts, with the transaction and custody costs included, will pay a slightly higher management fee than in non-wrap accounts, where those costs are not included in the fee. However, clients in a non-wrap account will pay the management fee solely for advisory services and will also directly pay any transaction costs assessed by the executing broker-dealer, such as commissions and transaction fees. The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client, and no advisory fee will exceed the maximum management fee noted above.

Tripletail's asset management fee is payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any unearned fees will be refunded to client.

Where acting in the capacity of an insurance agent, investment advisor representatives of Tripletail may as broker or agent effecting insurance transactions for typical and customary compensation. Clients are not obligated to use investment advisor representatives of Tripletail to execute such securities transactions.

This practice presents a conflict of interest by creating an incentive to recommend investment products based on the compensation received, rather than on a client's needs. However, Tripletail and its investment advisor representatives are fiduciaries by law and as such are required to put the interests of advisory clients before those of the firm or themselves. Tripletail maintains a Code of Ethics by which all employees must abide, and the Code of Ethics and other firm compliance policies and procedures are designed to prevent violations of securities laws.

A client may be able to invest in products recommended by the firm directly, without the services of Tripletail. In that case, the client would not receive the services provided by Tripletail which

are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives.

Commissions do not represent a majority of revenue from advisory clients. Tripletail does not charge advisory fees in addition to commissions or markups.

Item 5 Account Requirements and Types of Clients

The Advisor will offer its services to individuals, trusts, estates, charitable organizations, and corporations or other business entities.

The Advisor's cumulative minimum account requirement for opening and maintaining an account is \$500,000. However, based on facts and circumstances the Advisor may, at its sole discretion, accept accounts with a lower value.

Item 6 Portfolio Manager Selection and Evaluation

Tripletail offers the wrap fee alternative to clients as a pricing option and does not utilize unaffiliated money managers to serve the needs of wrap fee clients. All accounts in the wrap program are managed by Jason Adams, Member, and Erik Bonnett, Member.

Tripletail will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose certain restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

Clients will be charged a management fee that is inclusive of both the fee to Tripletail for advisory services as well as securities execution fees charged by the executing broker-dealer (except for short-term trading or redemption fees). The specific client circumstances will be defined in the agreement between the client and Tripletail.

A wrap fee program is defined as one where a fee is charged to the account that is not based directly on transactions in the account, and includes both the investment advisory services and the costs of executing the transactions in the account. Management fees for the inclusive pricing option are typically higher than management fees where the client pays securities transactions and/or custody costs separately.

Tripletail does not charge performance-based fees.

The Advisor utilizes fundamental analysis techniques in formulating investment advice or managing assets for clients.

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price

evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk.

The investment strategies the Advisor will implement may include long term purchases of securities held at least for one year, short term purchases for securities sold within a year, and option writing, including covered options, uncovered options or spreading strategies.

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

Risks of fundamental analysis may include risks that market actions, natural disasters, government actions, world political events or other events not directly related to the price or valuation of a specific company's fundamental analysis can adversely impact the stock price of a company causing a portfolio containing that security to lose value. Risks may also include that the historical data and projections on which the fundamental analysis is performed may not continue to be relevant to the operations of a company going forward, or that management changes or the business direction of management of the company may not permit the company to continue to produce metrics that are consistent with the prior company data utilized in the fundamental analysis, which may negatively affect the Advisor's estimate of the valuation of the company.

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks. Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be. The primary risks faced by investors include:

Business Risk

With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

The business risk in purchasing an annuity is that the financial strength of the insurance company issuing the annuity may decline and not be able to pay out the annuity obligation.

Volatility Risk

Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out of every three years. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

Inflation Risk

Inflation is a general upward movement of prices. Inflation reduces purchasing power, which is a risk for investors receiving a fixed rate of interest. The principal concern for individuals investing in cash equivalents is that inflation will erode returns.

Interest Rate Risk

Interest rate changes can affect a bond's value. If bonds are held to maturity the investor will receive the face value, plus interest. If sold before maturity, the bond may be worth more or less than the face value. Rising interest rates will make newly issued bonds more appealing to investors because the newer bonds will have a higher rate of interest than older ones. To sell an older bond with a lower interest rate, you might have to sell it at a discount.

Liquidity Risk

This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products, including private placement offerings and interests in partnerships investing in real estate. It may also be the case with products that charge a penalty for early withdrawal or liquidation, such as a certificate of deposit (CD).

The Advisor does not primarily recommend a particular type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

Item 7 Client Information Provided to Portfolio Managers

In accordance with Tripletail's Privacy Policy, Tripletail does not communicate any non-public financial information to unaffiliated entities.

Item 8 Client Contact with Portfolio Managers

Tripletail does not place any restriction on the client's ability to contact and consult with their Portfolio Managers and encourages clients to communicate with their Portfolio Managers whenever their circumstances change that may cause a change to their investor profile.

Item 9 Additional Information

Neither Tripletail nor its management persons have had any legal or disciplinary events, currently or in the past.

Neither Tripletail nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Tripletail 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.

Erik Bonnett is a Florida licensed attorney. In his practice Mr. Bonnett manages primarily trusts and estate planning matters. However, Mr. Bonnett does not intend to offer legal services to any Tripletail clients and therefore there is no conflict of interest.

Erik Bonnett and Jason Adams are also licensed and registered as insurance agents to sell life, accident and other lines of insurance for various insurance companies. Tripletail is a licensed and registered insurance agency through which Mr. Bonnett and Mr. Adams offer insurance products. They will be able to purchase insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. This creates a conflict of interest because of the receipt of additional compensation by Mr. Bonnett and Mr. Adams. Clients are not obligated to use Tripletail or Mr. Bonnet and Mr. Adams for insurance products services. However, in such instances, there is no advisory fee associated with these insurance products, and clients will be made aware of all commissions associated with the products prior to the transactions.

Tripletail does not recommend or select other investment advisers for clients.

Tripletail maintains a Code of Ethics pursuant to SEC rule 204A-1. Tripletail has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading by each employee of Tripletail deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Tripletail are conducted in a manner that avoids any conflict of interest between such persons and clients of the adviser or its affiliates. Tripletail collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Tripletail will provide a copy of the Code of Ethics to any client or prospective client upon request.

Tripletail does not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest.

Tripletail and/or its investment advisor representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of Tripletail can take advantage of the advance knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that

may affect the price of the securities owned by the Investment Advisor Representatives. To mitigate these conflicts, Tripletail has adopted a Code of Ethics as noted above. Tripletail's Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client's interest before those of the firm and themselves.

Tripletail requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment advisor representatives of Tripletail may trade for their own accounts securities that are being traded for client accounts at or about the same time. To mitigate the conflict of interest in such circumstances, Tripletail's policy is to require the trading of all relevant client accounts prior to the trading of their own accounts. The Chief Compliance Officer examines personal trading activities of Tripletail's personnel to verify compliance with this policy.

The firm reviews client accounts on a quarterly basis, or when conditions would warrant a review based on market conditions or changes in client circumstances. Triggering factors may include Tripletail becoming aware of a change in client's investment objective, a change in market conditions, change of employment, or a change in recommended asset allocation weightings in the account that exceed a predefined guideline. Client accounts are reviewed by Erik Bonnett, Member, and Jason Adams, Member.

The client is encouraged to notify the Advisor and Investment Advisor Representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from mutual funds, asset managers, trust companies or other custodians, insurance companies, broker-dealers and others who are involved with client accounts. Tripletail does provide quarterly account performance reports to clients, but does not deliver separate client statements.

Tripletail is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

Tripletail does not directly or indirectly compensate any person who is not a supervised person for client referrals.

Tripletail does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and is not required to file a balance sheet.

Tripletail has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Tripletail does become aware of any such financial condition, this brochure will be updated and clients will be notified.

Tripletail has never been subject to a bankruptcy petition.