

**Item 1 - Cover Page**

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



Doing Business As: Drawbridge Capital & Drawbridge Asset Management

**Gary M. Stanislawski**  
**CRD No. 2518714**

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

<http://www.drawbridge.capital/>

**March 2023**

This brochure supplement provides information about your Investment Advisor Representative that supplements the Drawbridge Capital, LLC 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.

**Gary M. Stanislawski**

Year of birth: 1959

### **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.

Oral Roberts University; Master of Arts

08/01/1991 - 05/04/1996

Oregon State University; Bachelor of Science

01/01/1979 - 08/01/1983

### **Business Experience**

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

Drawbridge Capital, LLC; Investment Advisor Representative

06/2004 - PRESENT

LPL Financial LLC; Registered Representative

04/2002 - PRESENT

### **Professional Designations**

The following provides information on professional designation(s) that your Investment advisor representative earned.

#### **Certified Kingdom Advisor® CKA®**

The Certified Kingdom Advisor® designation allows you to confidently integrate technical expertise and biblically wise counsel in your financial advising role. The designation sets you apart as a financial professional who has pursued faith/work integration to the highest credentialed level in the financial advising world.

#### **Certified Financial Planner™ - CFP® 09/1999**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its:

- (1) high standard of professional education;
- (2) stringent code of conduct and standards of practice; and,
- (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

**Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances.

**Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).

**Ethics** – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks.

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field.

**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose or, provide details.

#### **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 investment advisor representative is also a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities. Your investment advisor representative also may sell insurance and may receive commissions for insurance product sales. The potential for the receipt of commissions may give a broker an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, your investment advisor representative may only recommend securities and insurance products that he believes are in your best interests. If you have any questions regarding the compensation received when recommending a product, you should ask your representative. You are under no obligation to purchase investment or insurance products recommended through your investment advisor representative.

##### **Insurance Agency:**

Regent Financial Services, Inc is fully owned by Gary Stanislawski and is licensed as an independent insurance agency in the state of Oklahoma. As such, the agency and its agents can be contracted or appointed with various life, health, and disability insurance companies. To the extent that insurance products are purchased through the insurance agency by advisory clients, the agency and its agents may be paid a commission by the insurance company issuing the policy. This creates a conflict of interest as the potential for receipt of commissions may give the incentive to recommend insurance products based on the compensation received rather than on the client's needs. However, your investment advisor representative may only recommend insurance products that he believes are in your best interests. If you have any questions regarding the compensation received when recommending a product, you should ask your investment advisor representative. You are under no obligation to purchase insurance products recommended through your investment advisor representative.

#### **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 Financials' 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 Financials' 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, LLC 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.

Gary Stanislawski has not been involved in any of the above listed events or the subject of a bankruptcy petition.