



Timothy Waters
Form ADV, 2B
Brochure Supplement

January 1, 2019
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The Brochure Supplement provides information about Timothy Waters that supplements Triumph Capital Management's Brochure. You should have received a copy of the Brochure. Please contact Brandon Drespling, Chief Compliance Officer, if you did not receive Triumph Capital Management's brochure or if you have any questions about the contents of this supplement. Mr. Drespling can be reached at (720) 399-5555 or BrandonD@TriumphCapitalManagement.com.

Additional information about Timothy Waters is available on the SEC's website at www.adviserinfo.sec.gov. Information can be accessed by using CRD# 3083977.

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ITEM 2 – EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

TIMOTHY WATERS

- Born: 1976

POST – SECONDARY EDUCATION:

- Ohio State University – Bachelor’s Degree: Personal Financial Planning – 1999
- Successfully complete the General Securities Representative (Series 7), Uniform Securities Agent State Law Examination (Series 63), and Uniform Investment Adviser Law Examination (Series 65)
- Insurance Licenses: Life, Health, Variable, Long Term Care
- Certified Wealth Strategist – CWS

*The Certified Wealth Strategist designation is obtained by completing two instructor-led training sessions, self-directed study on numerous wealth management issues, and a capstone project. Three years of experience in the financial services industry that must also include direct interaction with clients and a 4-year degree are also required.

RECENT BUSINESS EXPERIENCE:

YEARS	EMPLOYMENT
2016 – Present	Triumph Capital Management, Investment Adviser Representative
2015 – Present	Summit Brokerage Services, Inc., Registered Representative
2015 – Present	Summit Financial Group, Investment Adviser Representative
2015 – Present	Cetera Investment Advisors, LLC, Investment Adviser Representative
2012 – 2015	J.P. Turner & Company, LLC, Registered Representative
2012 – 2015	JPTCM, Investment Adviser Representative
2009 – 2012	Raymond James Financial Services, Registered Representative

ITEM 3 - DISCIPLINARY INFORMATION

Mr. Waters has no history of any legal or disciplinary events that deem to be material to a client’s consideration of Mr. Waters to act as their investment adviser representative. FINRA’s BrokerCheck may have additional information regarding the disciplinary history of Mr. Waters that is not included in this brochure supplement. (<http://brokercheck.finra.org/Support/TermsAndConditions.aspx>)

ITEM 4 - OTHER BUSINESS ACTIVITIES

Mr. Waters is a registered representative of Summit Brokerage Services, Inc., a securities broker/dealer, and a member of the Financial Industry Regulatory Authority, Inc. Brokerage services through Summit Brokerage, Inc. are marketed using the name Triumph Capital, LLC. Triumph Capital, LLC is an independent firm and is not affiliated with Summit Brokerage Services, Inc. Advisory services are offered through Triumph Capital Management, a registered investment advisor.

As a broker-dealer, SBS engages in a broad range of activities normally associated with securities brokerage firms. Pursuant to the investment advice given by Mr. Waters, investments in securities will be recommended for you. If SBS is selected as the broker-dealer, it will affect transactions in securities for you, a client of Triumph Capital Management and Mr. Waters. By serving as the broker dealer, SBS and Mr. Waters will receive commissions for executing securities transactions.

You are advised that if SBS is selected as the broker-dealer, the transaction charges may be higher or lower than the charges you may pay if the transactions were executed at other broker-dealers. You should note, however, that you have the right to not purchase securities through Mr. Waters, Triumph Capital Management or SBS.

Mr. Waters holds an insurance license to sell insurance and does so through his registration with Summit Brokerage Services, Inc., as well as holding appointments directly with various insurance companies. Mr. Waters spends less than 10% of his time providing insurance products. Commissions may be earned by Mr. Waters if insurance products are purchased through insurance companies. This may or may not create a conflict of interest.

Mr. Waters will provide advice regarding investment company securities. You should be aware that, in addition to the advisory fees paid by you, each investment company also charges its own separate investment advisory fees and other expenses (internal management fees). In addition, you should be aware that mutual funds may be purchased separately independent of the investment management services of Triumph Capital Management.

Mr. Waters, in his capacity as registered representatives of SBS, or agents appointed with various life, disability, or other insurance companies, receives commissions, 12(b)-1 fees, trails, or other compensation from the respective product sponsors and/or as a result of effecting securities transactions for you. However, you should note that you have the right to not purchase any investment products through Mr. Waters. On advisory accounts through Triumph Capital Management, Mr. Waters will not receive any other compensation.

If you engage your IAR to provide advice relative to your alternative Investments, you will pay a fee for this service. This advisory fee is separate and in addition to the internal costs inherent to your alternative investment, and will be calculated as a percentage of your alternative investment account value, as reported by the custodian where your alternative investment is held. When this service is provided to you directly by your IAR, the advisory fee is not to exceed 3% per year. The advisory fee you will be charged will be clearly outlined in the advisory agreement you sign with your IAR.

Due to commission payments associated with certain alternative investments, they present a conflict of interest because they create an incentive to make recommendations based on the compensation that we receive rather than based on your needs. We will explain the specific costs associated with any recommended investments with you upon request. Alternative investments may have different shares

classes available for purchase including no load options. Please review the prospectus closely and discuss with your IAR. In such cases where a commission was paid on an alternative investment, Triumph Capital Management will not allow its IAR's to charge a fee for this service for a period of three years following when the IAR sold the alternative investment to you. If your IAR did not sell the alternative investment to you, this three-year waiting period may or may not apply.

Mr. Waters is also an IAR of Summit Financial Group, and can offer a variety of advisory programs and services through Summit Financial Group in addition to the advisory services he can offer through Triumph Capital Management. Summit Financial Group is an affiliated RIA of Summit Brokerage Services, Inc. More Information on the services available through Summit Financial Group may be found in their firm brochure, available upon request from Mr. Waters.

Mr. Waters is also an IAR of Cetera Investment Advisors, LLC, and can offer a variety of advisory programs and services through Cetera Investment Advisors, LLC in addition to the advisory services he is able to offer through Triumph Capital Management. More information on the services available through Cetera Investment Advisors, LLC may be found in their firm brochure, available upon request from Mr. Waters.

Mr. Waters is the owner of Waters Financial Group, LLC. Waters Financial Group is an LLC created for tax planning and bill paying purposes. There are no investments products offered to clients through this entity.

ITEM 5 - ADDITIONAL COMPENSATION

Mr. Waters may also receive incentive-based non-cash compensation in the form of additional compensation or reimbursement arrangements which may include payments in connection with events, conferences or seminars, sales or training programs, trips (which may include travel, lodging and meals), and/or in the form of entertainment, merchandise or other benefits. While non-cash compensation programs are designed to encourage IARs and to consider and recommend certain products of investments, the conferences, seminars and training programs provided by such non-cash compensation arrangements help IARs stay current with changing products and economic issues. Such training may ultimately position IARs with resources to help serve their clients' financial needs. Although non-cash compensation payments may create a conflict of interest, based on current fiduciary and suitability standards, Mr. Waters is required to make recommendations appropriate to each client's individual needs and objectives.

ITEM 6 - SUPERVISION

Mr. Waters is supervised through a compliance program designed to prevent and detect violations of the federal and state securities laws. Supervision is conducted by the Chief Compliance Officer, Brandon Drespling, who is responsible for administering the policies and procedures. Mr. Drespling reviews those policies and procedures annually for their adequacy and the effectiveness of their implementation.

Brandon Drespling
Chief Compliance Officer
(720) 399-5555

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