

FORM CRS – CLIENT RELATIONSHIP SUMMARY
TRINITY CAPITAL MANAGEMENT, LLC
JUNE 18, 2020

Trinity Capital Management, LLC (“TCM,” “Firm,” “we,” “our,” or “us”) is an investment advisory firm registered with the Securities and Exchange Commission (“SEC”). Fees for brokerage and investment advisory services differ and it is important for you to understand the difference. Free and Simple Tools are available to research firms and financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

For retail clients, we provide investment advisory services that include investment management and Advanced Planning services. We customize these services based on your financial needs, investment objectives, and goals.

Advanced Planning services are provided on a non-discretionary basis. Non-discretionary means we provide recommendations to you and you make the ultimate decision of whether or not to implement the recommendation, including the purchase or sale of investments. Our Advanced Planning services are comprehensive and can include cash flow planning and tax mitigation, which can be performed in coordination with your CPA or attorney; risk mitigation and transferring risk to insurance companies; maximizing the impact of your charitable giving; gifting and estate planning considerations; net worth calculations; spending and saving plans; and long-range planning (for retirement, education and legacy planning). Each written plan will reflect the needs and desires of each individual client, and you have the option to utilize TCM to implement any or all of our recommendations but are not obligated to do so. Clients are free at all times to accept or reject any or all recommendations made by TCM.

Ask one of our financial professionals the following questions:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

Investment management services are offered on a fully discretionary basis. Discretionary authority allows us to decide the type and amount of securities to be bought or sold for your account and when to invest, without consulting you first. We maintain this discretion until it is revoked (*e.g.*, by termination of our agreement or upon written instruction from you). You may impose conditions or restrictions on your portfolio. For our investment management services, we create, based on your objectives, needs, guidelines, risk tolerance, and other information you provide, a tailored portfolio management solution and target asset allocation.

We primarily utilize mutual funds, exchange-traded funds, stocks, and certain fixed income instruments, such as certificates of deposit and money market funds. We review portfolio management accounts on an ongoing basis, with each account reviewed at least annually. We also perform a review when there is a change to your financial situation, a need to rebalance to maintain

the asset class integrity of your account, or a change in a fund or security used to represent an asset class. Reviews for Advanced Planning services may be conducted periodically if agreed to upon engagement. We do not generally require a minimum asset value, although we do have a minimum fee. Please see below for more information on fees.

For further information about our services and advice please read Items 4, 7, and 8 of our Form ADV Part 2A disclosure brochure. Please contact us at (805) 963-0500 to request a copy of the Form ADV Part 2A or go to www.adviserinfo.sec.gov.

What fees will I pay?

We charge an annual investment management fee that is billed quarterly in arrears and based on the total value of assets in each of your managed accounts (“AUM”) as of the close of business on the last business day of the quarter. As your managed assets go up, your fee percentage will go down. For accounts up to \$500,000 in AUM, the fee is 1.20%; for accounts over \$500K up to \$2,000,000, the fee is 0.80%; between \$2M and \$5M, 0.60%; between \$5M and \$10M, 0.50%; and accounts with a value over \$10,000,000 pay 0.45% of AUM annually. When calculating AUM, the total account value includes cash/equivalents. We will consider all accounts which constitute a “household” together—typically any spouse, parent, child, partner, or sibling who shares a residence with you. Our fee is adjusted on a pro-rata basis for deposits or withdrawals during the billing period. Our minimum investment management fee is \$3,000 per year, although our fees are negotiable, and we reserve the right to reduce or waive any fees. For standalone Advanced Planning services, we typically charge a flat fee between \$500 and \$20,000, depending on the type,

scope, and complexity of services. If you are an investment management client, we will typically waive any Advanced Planning fees if your investment management fee is at least \$10,000 annually.

Because we charge an asset-based fee, the more assets that are in your advisory account, the more you will pay in fees. This presents a conflict of interest because the firm has an incentive to encourage you to increase the assets in your account. You will also pay additional fees to third parties in connection with your managed account. These can include (as applicable), transaction costs, retirement plan administration fees, deferred sales charges on mutual funds, 12b-1 fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and others. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

More detailed information about our fees and other costs associated with investing, along with applicable conflicts can be found in Items 5, 10, and 14 of our Form ADV Part 2A disclosure brochure. Please contact us at (805) 963-0500 to request a copy of the Form ADV Part 2A or go to www.adviserinfo.sec.gov.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.

TCM recommends Charles Schwab & Co, Inc. (“Schwab”) to serve as custodian to our clients. Under this arrangement, we receive certain products and services from Schwab at no cost that benefit us but do not benefit our clients. Certain of these products and services assist us in managing and administering our clients’ accounts and others help us develop our business. The receipt of such creates a conflict of interest as it gives us an incentive to have clients custody their assets at Schwab.

Ask one of our financial professionals the following questions:

How might your conflicts of interest affect me, and how will you address them?

More detailed information about our conflicts of interest can be found in Items 4, 10, 11, 12, and 14 of our Form ADV Part 2A disclosure brochure. Please contact us at (805) 963-0500 to request a copy of the Form ADV Part 2A or go to www.adviserinfo.sec.gov.

How do your financial professionals make money?

Each TCM financial professional is paid a salary and a discretionary bonus. Neither the salary nor bonus is based on or tied to the number of clients that have been referred to us or the types of investment products we recommend to clients. Mr. Fredric B. Fisher and Mr. Andrew Y. Bucher are owners of TCM in addition to their roles as investment advisers. As owners, they participate in the profits and losses of the Firm. Additional information about the compensation received by TCM professionals and any related conflicts of interest are outlined in each professional’s Form ADV Part 2B, which can be obtained by calling us at (805) 963-0500.

Do you or your financial professionals have legal or disciplinary history?

No. Please go to www.Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Ask one of our financial professionals the following questions:

Who is my primary contact person? Is he or she a representative of an investment adviser or broker –dealer?

Who can I talk to if I have concerns about how the person is treating me?

Ask one of our financial professionals the following questions:

As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

You can obtain additional information and/or request a copy of this Form CRS by going to www.adviserinfo.sec.gov or by calling us at (805) 963-0500.