

FORM CRS (Client Relationship Summary)

Trinity Capital Management, LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This Client Relationship Summary describes the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me?

We primarily offer the following investment advisory services to retail investors: **Portfolio Management Services; Financial Planning and Consulting Services; and, Selection of Other Advisers and Educational Workshops/Seminars.**

Account Monitoring: If you open an investment account with our firm, as part of our standard service we will monitor your investments on an annual basis.

Investment Authority: We manage investment accounts on a **discretionary** basis whereby we will decide which investments to buy or sell for your account. We will also have discretion to select, retain or replace third-party managers to manage your accounts. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

We also offer **non-discretionary** management services whereby we will provide advice, but you will ultimately decide which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Investment Offerings: We provide advice on various types of investments. Our services are not limited to a specific type of investment or product.

Account Minimums and Requirements: We require a minimum of \$250,000 to establish a managed account. However, in our sole discretion we may accept clients that do not meet our minimum account requirements. If you are referred to a third-party manager, you should review that third-party manager's Disclosure Brochure for any account requirements imposed by the third-party manager.

For a description of each service, please refer to our Form ADV Part 2A (Items 4, 5, 7, 13 & 16, among others) by clicking the following link: [ADV Part 2](https://adviserinfo.sec.gov/firm/brochure/289583) (the full URL for the aforementioned hyperlink is: <https://adviserinfo.sec.gov/firm/brochure/289583>).

Key Questions to Ask Your Financial Professional

- **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?**

What fees will I pay?

The following summarizes the principal fees and costs that you might pay when engaging our firm for investment advisory services. [ADV Part 2](#).

- **Asset Based Fees** - Payable quarterly in advance. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict;
- **Hourly Fees and Fixed Fees** - Fees are typically payable in advance, but we may negotiate other fee-paying arrangements; and,
- **Other Advisory Fees** - In addition to our fees, you may also pay fees charged by the selected third-party manager depending on your investment objectives and portfolio strategy. In some instances, we may share in the fee paid to the third-party manager.

Examples of the most common fees and costs applicable to our clients are: custodian fees; account maintenance fees; management and other fees related to mutual funds and exchange-traded funds; and certain transaction charges and related costs when purchasing or selling securities.

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. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link [ADV Part 2](#).

Key Questions to Ask Your Financial Professional

- **Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

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. Please refer to our ADV Part 2 by clicking this link to help you understand what conflicts exist: [ADV Part 2](#). Here is an example to help you understand what this means:

- ***Third-Party Payments:*** Our firm's financial professionals may be registered representatives with a broker-dealer and/or licensed insurance agents. These persons receive commission-based compensation in connection with the purchase and sale of securities and/or insurance-related products, which is separate and in addition to our advisory fees. These practices present conflicts of interest because these individuals have a financial incentive to recommend certain investment products to you.

Key Questions to Ask Your Financial Professional

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

Refer to our Form ADV Part 2A Brochure by clicking this link [ADV Part 2](#).

How do your financial professionals make money?

The financial professionals servicing your account(s) are compensated by salary and may receive a bonus. Financial professionals' compensation is based on the amount of client assets they service and/or the revenue the firm earns from the financial professionals' services or recommendation. Certain financial professionals receive commission-based compensation based on the investment and/or insurance products sold (i.e. differential compensation or commission) in their separate capacities as registered representatives of a broker-dealer and/or as licensed insurance agents.

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

Yes. In 2016, prior to joining our firm, Carroll Douglas Davenport, an investment adviser representative of our firm, provided an affirmative disclosure related to a medical bill dispute on his Form U4. This disclosure is not associated with any client account or transaction. Visit Investor.gov/CRS for a free and simple tool to research our firm and our financial professionals.

Key Questions to Ask Your Financial Professional

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

You can request a copy of the Client Relationship Summary at 901-757-4448 and you can find additional information about your investment advisory services by clicking the following link: [ADV Part 2](#).

Key Questions to Ask Your Financial Professional

- **Who is my primary contact person?**
- **Is he or she a representative of an investment adviser or a broker-dealer?**
- **Who can I talk to if I have concerns about how this person is treating me?**