

# Form ADV Part 2A Brochure

Trinity Wealth Advisors, L.L.C.

132 W. Washington Avenue, Suite 200

St. Louis, MO 63122

[www.trinitywealth.com](http://www.trinitywealth.com)

314-966-0033

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This Brochure provides information about the qualifications and business practices of Trinity Wealth Advisors, L.L.C. If you have any questions about the contents of this Brochure, please contact us at 314-966-0033. 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.

Trinity Wealth Advisors is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you can determine whether to hire or retain an adviser.

Additional information about Trinity Wealth Advisors is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

This Brochure, dated March 26, 2024, represents the annual amendment to Trinity Wealth Advisors, LLC's previously published annual update Brochure.

Since the filing of the firm's last annual update Brochure on March 30, 2023, we have made various minor updates but no material changes were made.

Pursuant to SEC regulations, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at (314) 966-0033.

Additional information about Trinity Wealth Advisors is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Trinity Wealth Advisors who are registered as investment adviser representatives of the firm.

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## **Item 4 – Advisory Business**

Trinity Wealth Advisors, L.L.C. (CRD # 109452) (Trinity) is registered as an investment adviser with the United States Securities and Exchange Commission. Trinity is based in Missouri and is organized as a Limited Liability Company under the laws of the State of Missouri and the United States of America. Trinity's principal owner is James E. Matush, Jr., although the firm's ownership includes other stockholding partners. The firm has been in business since 1997 and currently has 6 employees.

Trinity's main office and place of business is located at 132 W. Washington Avenue, Suite 200, St. Louis, Missouri 63122. Regular business hours are from 8:00am to 5:00pm Monday through Friday. The firm can be contacted by phone at (314) 966-0033.

### Wealth Management Services

The Trinity approach to wealth management is all about maximizing the Return on Life of our clients through a process in which their vision for family and causes is wed with their resources! Our clients tell us that for the first time they can see their financial choices in the context of their greater life goals... and that the sense of clarity, purpose, and alignment is unparalleled.

To achieve the above we utilize a clearly defined wealth management process, that systematically addresses the 5 major concerns of financially established families:

- Wealth Sustainability - will my assets last my lifetime at my lifestyle
- Wealth Enhancement - maximizing what I get for my money
- Wealth Protection – minimizing the effects of catastrophes
- Wealth Transfer – best transfer of assets and family values to heirs
- Charitable Giving – effectively supporting causes we care about

But sometimes clients are curious about the key financial services we offer as part of an overall wealth management roadmap, which can include:

- Return on Life Tools and consulting
- Retirement coaching and planning

- Investment analysis, strategy and management
- Cash flow management
- Major purchase or liquidation consulting
- Tax coordination
- Education planning and saving
- Insurance analysis and risk management
- Estate planning and wealth transfer
- Charitable giving strategy
- Business and succession planning
- Family Meetings
- Team Assessments

We manage investment portfolios with outside institutional investment managers that we recommend on your behalf. These outside managers are selected from the dozens we track and are granted discretionary authority to select investments. Typically, we seek your guidance as to the selection of those managers and the risk level of their portfolios, but we do have the authority to make those decisions independently if necessary. Our investment managers and the platform from which we obtain them are responsible for providing account and performance data reporting. We are responsible for general investment and economic oversight as well as overall portfolio reporting. We do not sell proprietary investment products or limit clients to certain types of investments. Portfolio management services are tailored to your individual needs and you may impose discretion or investment restrictions. Various minimums apply depending on the platform, but we reserve the right to accept or reject engagements.

Because the firm is a registered investment adviser, we are required to meet certain fiduciary standards when providing investment advice to clients. Additionally, when we provide investment advice related to a retirement plan account or an individual retirement account, we are considered fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. As such, we are required to act in your best interest and not put our interest ahead of yours, even though our compensation creates some

conflicts with your interests in that the more you have us manage, the more we can earn. Our clients however are under no obligation to use services recommended by our associated persons. Furthermore, we believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

### Retirement Plan Services

Trinity also provides retirement plan services to businesses which may include plan level services such as discretionary management services, non-discretionary management services, and investment advisory services related to different types of retirement plans. When providing management services, the firm is responsible for implementing recommendations. When the firm is providing advisory services, the client is responsible for implementation of recommendations.

As of December 31, 2023, Trinity managed approximately \$256,568,946 of which approximately \$231,526,023 was managed on a discretionary basis and \$25,042,923 was managed on a non-discretionary basis. Trinity also provides advisory services on approximately \$23,500,000 in other assets.

## **Item 5 – Fees and Compensation**

### General Fee Information

Fees and the assets they apply to are disclosed to the client before entering into any advisory services contract and may be subject to change. Fees are usually payable quarterly in advance, although on some platforms and in some other instances fees may be payable in arrears. Fees are generally deducted from a client's account, although in some cases may be direct billed. All Trinity fees are negotiable based on the scope of the engagement. Upon termination, any unearned fees are returned, prorated for the time period not utilized. Depending on the platform used, accounts will generally incur incidental fees (custodial, transaction, program, etc.) which are in addition to Trinity's fee, but these fees will be fully disclosed to the client if applicable.

Trinity's fee rate may be as high as 1.35% of assets it oversees and/or is under management, but it is frequently less depending on the services rendered, the value of the assets managed, and whether outside managers are used. All fees paid to Trinity are separate and unrelated to any fees or expenses assessed by mutual funds or exchange traded funds, or to any trade commission charged by an account custodian. Information

pertaining to fund-generated fees and expenses can be found in mutual fund and exchange traded fund prospectuses. Custodial fees range from 0.0% to 0.25% depending on the custodian used and as mentioned above are in addition to Trinity's fees. Trinity does not receive any portion of the custodial fees.

Depending upon the complexity of the task(s), the client is charged a fee based on the assets that we oversee even if we do not hold those assets with our preferred custodians. Such assets might include mutual funds, exchange traded funds, individual securities, variable annuity sub-accounts, private placements, money market funds, etc. Further consideration will be given to overall fees incurred by the client, and adjustments can be made, for example, if more or less work is required to service the account.

Investment Management retainers are also available to emerging wealth clients or for special situations and are typically charged on a quarterly basis. Investment Management retainer fees are negotiable.

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.

#### Outside Investment Managers

Trinity often recommends or selects outside investment managers that provide specialized discretionary management of Client portfolios. Outside managers can be retained under a sub-advisory arrangement, under a third party investment management arrangement, or using a direct mutual fund platform. When a sub-advisor is recommended or selected, the applicable fee paid by the Client will be subject to a sub-advisory agreement between Trinity and the sub-advisor and will be disclosed in advance. When a third party manager is recommended or selected, the applicable fee paid by the Client will be subject to a third party management agreement between the Client and the third party manager and will be disclosed in advance. Third party management arrangements may be made directly or through outside provider platforms. When a direct mutual fund platform is recommended or selected, the applicable fee paid by the Client will be subject to the fund's expense ratio and the fee debiting arrangement made between the fund and Trinity, both of which will be disclosed in advance.

Third-party investment managers and sub-advisors charge fees that vary depending on the manager and type of assets managed. Typical asset-based fees are less than 0.5% but in rare instances could be as high as 1.00% annually. These fees are separate from Trinity's

fee, regardless of whether a third-party manager is used (i.e. Client contracts with manager) or a Trinity sub-advisor is used (i.e. Trinity contracts with manager). Some of these managers or the platforms that provide them may set minimum fee amounts or have a minimum account size.

Direct mutual fund platforms charge fees in the form of expense ratios that vary depending on the fund manager and type of assets managed. Typical expense ratios range from 0.5% to 1.00% annually. These expense ratios are separate from Trinity's fee which may be deducted but the fund pursuant to a fee debiting arrangement. Some of these direct mutual fund platforms may have a minimum account size.

As mentioned above, Trinity may occasionally refer clients to other asset managers and instead of charging a fee will receive a portion of the fee charged by the manager.

Please consult your Trinity Wealth Advisors' Investment Management Proposal for specific fees charged.

Details about each third party manager or sub-advisor, including their fees and business practices, are available in each manager's Form ADV Part 2A Brochure. These may be obtained from that manager, us, or via the SEC's web site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### Financial Planning

In addition to rendering investment advice, Trinity provides comprehensive financial planning services including retirement plans, insurance needs analysis with potential product recommendations, qualified plan options and recommendations, and estate planning techniques and solutions to minimize the estate tax impact. Typically, fees for financial planning are provided with ongoing management engagements, but in special situations a one-time fee of \$5,000 or less paid in arrears is possible. Our coaching and financial planning fees are separate from any fees or expenses assessed by outside parties. Financial planning retainers are negotiable and typically charged on a quarterly basis.

### Retirement Plan Services

Fees charged for retirement plan services may be charged in advance or in arrears depending on the service provided. Fees may be fixed or asset based (not to exceed 1.0% annually), and are negotiable depending on the complexity of the service. Fee levels (whether fixed or asset based) are primarily based on actual services to be provided.



Fees may be deducted directly from client accounts on a monthly or quarterly basis, or clients may elect to alternatively pay fees by check or wire transfer. There is a minimum annual fee of \$1,000 per plan.

Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated accordingly. Any payments made in advance will be prorated and refunded to the client.

All retirement plan fees paid to Trinity are separate and unrelated to any fees or expenses assessed by any broker, custodian, or other outside party.

### Insurance Products

Trinity is registered as an insurance agency and can provide insurance products and services to clients through specialists it deems appropriate for specific product recommendations. As a result, Trinity may receive commissions paid in connection with insurance sales. While we endeavor to only make recommendations that are in the best interests of our clients, and are consistent with our clients' needs, the receipt of these commissions is a conflict of interest because additional compensation provides a financial incentive to make certain recommendations. Our clients, however, are under no obligation to purchase products recommended by our associated persons or to purchase products through our associated persons.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

Trinity does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), and consequently does not simultaneously manage performance based and non performance based accounts.

### **Item 7 – Types of Clients**

Trinity generally works with individuals and their families to help them reach their investment goals.

The minimum investment required for new family relationship accounts is \$400,000. The minimum investment required for an individual relationship account is \$25,000. These minimums can be waived at times, particularly for legacy clients.

As noted in Item 5 above, some third-party investment managers and sub-advisors may also set a minimum fee amount or a minimum account size.

The firm also works with businesses and other institutional clients.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

Trinity's investment strategy is to actively manage client assets subject to a client's individual situation. To implement this strategy, Trinity may use long term or short term securities purchases, may use outside investment managers, or may use other types of investments. We use a variety of analytical methods when researching investments, including charting, technical, fundamental and cyclical investment analysis.

Each outside investment manager will employ their own strategies, managed account structures, and methods of analysis when implementing their respective investment strategies.

Certain trading strategies can affect investment performance through increased brokerage and other transaction costs. However, each client's propensity for risk is evaluated, documented, and considered throughout the portfolio implementation process.

Investing in securities involves risk of loss that clients should be prepared to bear. Such risks include market risk, interest rate risk, liquidity risk, currency risk, and political risk, among others.

No investment strategy can assure a profit or avoid a loss.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the

integrity of its management. Trinity is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

## **Item 10 – Other Financial Industry Activities and Affiliations**

### *B.O.S. Group, Inc. (d/b/a ASA Group, Inc.)*

One of Trinity's partners, Alan Smith, is also the owner of an insurance agency, ASA Group, Inc. Clients should be aware that any recommendations regarding purchases of insurance products carry with them an inherent risk for a conflict of interest, if a client purchases products from the related agency. No client is obligated in any way to obtain any recommended insurance products from the related agency.

### *Business Owner Strategies, Inc. (d/b/a ASA Advisors, Inc.)*

Mr. Alan Smith is also the owner and Principal of his own investment advisory firm, ASA Advisors, Inc. Currently the two firms do not have any mutual arrangements, but may in the future refer certain Trinity clients to one or more ASA platforms.

### *Other Financial Industry Activities*

Trinity has an arrangement with Advisor Credit Exchange (ACE) to provide assistance for clients who may be in need of lending solutions. This exchange allows Trinity clients access to various types of financing programs within ACE's platform. Trinity is eligible to participate in a fee sharing arrangement for some loans which is used by Trinity to offset administrative time required by the firm to assist in the setup and introduction of the lenders. Neither quoted interest rates nor lending terms are increased as a direct result of this arrangement. Trinity clients are under no obligation to participate in ACE programs.

## **Item 11 – Code of Ethics**

### **Code of Ethics**

Trinity has adopted and maintains a Code of Ethics expressing the firm's commitment to ethical conduct. Trinity's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and details practices for reviewing the personal securities

transactions of supervised persons with access to client information. The Code also requires compliance with applicable securities laws, addresses insider trading, and details possible disciplinary measures for violations. Trinity will provide a complete copy of its Code of Ethics to any client upon request to the Chief Compliance Officer.

### **Trading Conflicts of Interest**

Trinity's associated persons may recommend to clients the purchase of investment products in which a related person or entity may receive compensation. Certain mutual funds and variable annuities may make payments to broker-dealers as compensation for distribution or administrative services which may be paid out of the fund's assets ("12b-1 fees"). A fund that generally imposes a front-end sales charge but waives that sales charge may bear 12b-1 fees in excess of .25% (the maximum allowed for no-load funds).

Because of these compensation arrangements, a conflict of interest exists in connection with the recommendation of certain mutual fund investments or variable annuities for a client's account.

To address this conflict, the 12b-1 fee, deferred sales charges and other fee arrangements will be fully disclosed to the client in advance, and compensation arrangements are structured to be consistent with securities laws. In addition, such charges are described in the applicable fund's prospectus. Furthermore, Trinity's fees are generally equivalent to, or may be waived or offset by, fees or commissions earned.

Individuals associated with TWA are also permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. However, no person employed by TWA is allowed to favor his or her own interest over that of a client or make personal investment decisions based on the investment decisions of advisory clients.

In order to address conflicts of interest, TWA requires that associated persons with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer for review.

### **Item 12 – Brokerage Practices**

Trinity does not maintain custody of client assets. Instead, we require all client assets be maintained in an account at a non affiliated "qualified custodian", a broker dealer or bank. Trinity generally recommends that clients establish brokerage accounts with Pershing

Advisor Solutions, SEI, Fidelity Brokerage Services or the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), all registered broker-dealers, members SIPC/NYSE, but assets may be held elsewhere. While we may recommend certain brokers or custodians, you will ultimately decide whether to do so and will open your account with them by entering into an account agreement directly with them. Although Trinity cannot actually open accounts for you, we can assist you in opening an account.

When recommending brokers or custodians for its clients, Trinity considers many different factors including quality of service, services offered, execution quality, transaction costs, reputation of the firm, financial resources, and stability, among others. In determining the reasonableness of a broker's compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

#### Your Brokerage and Custody Costs

Our clients receive various services directly from our custodians. Compensation to the custodians for these services is generally provided by the mutual fund companies the client holds, a small asset-based fee, or by charging commissions or other fees on trades that the custodian executes. In all cases minimum annual fees may apply. Fee structures vary by custodian, but are typically preferential to you because of the larger amount of assets we hold with our custodians.

Since our custodians charge you a fee for each trade that we have executed by a different broker-dealer, we have the custodian execute most trades for your account in order to minimize your trading costs.

We have determined that having the custodian execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means seeking the most favorable terms for a transaction based on all relevant factors, including those listed above.

#### Products and Services Available to Us from Platform Providers/Custodians

Our custodians provide us and our clients with access to its institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to retail customers. Our custodians also make available various support services, some of which may help us manage or administer our clients' accounts, while others may help us manage and grow our business.

Our custodians' institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset

custody. The investment products available through our custodian include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Our custodians also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both the custodian's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the custodian. In addition to investment research, the custodian also makes available software and other technology that provides access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

Our custodians also offer other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from our custodians benefits us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with one of our custodians based on our interests rather than yours, which is a conflict of interest. We believe, however, that our selection of our custodians is in the best interests of our clients, and is primarily supported by the scope, quality, and price of our custodians' services.

### **Item 13 – Review of Accounts**

Each investment advisory account is reviewed initially at the time of entering into an advisory agreement. In addition, third-party managed or sub advised accounts are reviewed daily by the third party manager or sub advisor. Investment performance and allocation are reviewed quarterly by Trinity's investment committee including James E. Matush, Jr., James B Evens, Alan M. Smith, and Eric Steiner.

Managed accounts are typically reviewed with clients at least quarterly. Depending on client needs, a simple investment review may be performed annually instead.

Clients receive various written reports depending on the services for which the client has contracted. Clients with managed accounts receive quarterly reports from Trinity summarizing asset allocation and overall performance. The frequency of reports to clients receiving other services is determined by the client's needs and directions. Clients also receive periodic account statements (usually monthly or quarterly) directly from the custodian of the account.

Clients invested in third-party investment manager platforms generally receive monthly account statements that provide account holdings and monthly activity.

Clients are encouraged to carefully review custodial statements and compare them to any other reports they may receive from Trinity or platform providers.

## **Item 14 – Client Referrals and Other Compensation**

### **Payments for Referrals**

Trinity may periodically choose to pay other professional entities to refer clients to us. However, such future agreements are required to be structured to be in compliance with applicable securities laws. Each client would be provided a disclosure prior to or at the time of entering into any advisory contract which would describe the specific compensation arrangement. Clients referred to Trinity by outside parties would not pay additional fees in order to compensate outside solicitors. Instead, Trinity would pay outside solicitors from the fee we collect.

### **Other Benefits and Compensation Received**

Trinity receives an economic benefit from our custodians in the form of the support products and services that are made available to us and to other independent investment advisors. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 above. The availability to us of our custodian's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

In certain situations, we may refer clients to other third party managers who may pay us referral fees. The receipt of these referral fees is a conflict of interest. However, if such a manager is retained, no advisory fee will be charged by Trinity and a disclosure related to the referral arrangement will be provided. Moreover, our clients are under no obligation to accept and act upon recommendations made by Trinity or its associated persons. We believe, however, that our recommendations are in the best interests of our clients, and are consistent with our clients' needs.

## **Item 15 – Custody**

As noted in Item 12, Trinity generally recommends that client's custody assets with either Fidelity Brokerage Services or the Schwab Institutional division of Charles Schwab & Co., Inc., Pershing Advisor Solutions and SEI, all registered broker-dealers, members SIPC/NYSE, to maintain custody of clients' assets and to effect trades for their accounts. We may however have limited control in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements to you (although various types of written authorizations are required depending on the type of disbursements).

Trinity urges all clients to carefully review custodial statements and compare them to the account reports that we or a platform provider may provide.

## **Item 16 – Investment Discretion**

Trinity will accept discretionary authority to manage securities accounts on behalf of clients, and will also accept non discretionary accounts.

When granted authority to manage accounts, Trinity and its third party managers and sub advisors customarily have the authority to determine which securities and the amounts that are bought or sold. Any discretionary authority accepted by Trinity, its third party managers or sub advisors is subject to the client's risk profile and investment objectives, and may be limited by any other limitations provided by the client in writing.

Trinity will not exercise or delegate any discretionary authority until it has been given authority to do so in writing. Such authority may be granted in the written agreement between Trinity and the client, in the written agreement with the third party custodian, or in third party management documents. Under the Envestnet and Assetmark program



agreements, Trinity is granted discretionary investment authority while Envestment & Assetmark function as a non-discretionary service provider.

### **Item 17 – Voting Client Securities**

Trinity does not vote proxies for clients but will, upon request, discuss with the client any questions regarding proxy matters so the client can make an informed decision in voting proxies themselves.

### **Item 18 – Financial Information**

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about their financial condition. For example, if the firm requires prepayment of fees for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make disclosures.

Trinity has no financial or operating conditions which trigger such additional reporting requirements.