



TRINITY CAPITAL INVESTORS

FORM ADV II

This brochure provides information about the qualifications and business practices of TRINITY Capital Investors, Inc., If you any questions about the contents of this brochure, please contact us at (601) 956-3511 and / or jswilson@trinitycap.net 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.

Additional information about TRINITY Capital Investors is also available on the SEC's website at www.adviserinfo.sec.gov

Material Changes: There have been no material changes at TRINITY as it relates to TRINITY's services, advisory fee arrangements, relationships with related persons or outside entities, nor have there been any changes in advisory personnel or changes to the organization.

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I. Firm Description

TRINITY is a registered investment advisor specializing in managing investment portfolios for Mississippi public entities and self insured funds. TRINITY adheres to the time honored discipline of value oriented investing: believing that identifying strategies and securities with superior relative value is the product of diligence, experience, hard work and expertise.

TRINITY was formed in 1999 to serve the specific investment needs of the self insured industry. TRINITY recognizes the role the investment portfolio plays in the overall management of the fund. We actively seek information from the fund actuary and SIFs claims agents to ensure the investment portfolio is complimentary to claims/administrative needs while maintaining tail coverage as dictated by actuarial studies.

TRINITY serves public entities in the State of Mississippi. TRINITY focuses on fixed income investing utilizing US government bonds, mortgage backed securities as well as, taxable municipal bonds. TRINITY seeks to maximize current income from the investment portfolio while maintaining a watchful eye over future changes in the current interest rate scenario.

TRINITY also serves high net worth individuals and families in the State of Mississippi. TRINITY focuses on fixed income investing utilizing high grade corporate bonds, as well as, tax free municipal bonds. In a similar fashion as investing for SIFs and public entities TRINITY seeks to maximize current income from the investment portfolio while maintaining a high degree of credit quality.

II. Fees and Compensation

TRINITY charges 25 basis points on client assets under management up to \$10,000,000. The charge on amounts over 10,000,000 is negotiated on a client by client basis. All fees are negotiable.

Fees are calculated on average balances under management and are paid quarterly in arrears. Clients may have fees deducted from their respective accounts or may be billed / invoiced and paid for fees incurred.

III. Performance Based Fees and Compensation

TRINITY does not offer performance based fees.

IV. Client Descriptions

TRINITY clients are: self insured funds (SIFs) in the State of Mississippi
various public entities in the State of Mississippi
colleges and universities in the State of Mississippi
charities and non profit entities in the State of Mississippi
credit unions in the State of Mississippi
high net worth individuals in the State of Mississippi.

TRINITY currently has 45 client relationships with total assets under management of approximately \$465,000,000.

V. Investment Process

TRINITY utilizes client meetings and discussions to determine client needs and goals and equally important, client risk tolerance. Once this process is complete, TRINITY develops a customized portfolio for each client utilizing various investment vehicles. TRINITY uses:

- US government bonds
- Corporate bonds
- Closed end bond funds
- Mortgage backed securities
- Municipal bonds
- Equities
- Mutual funds
- ETFs

Each clients' cash position and cash needs are evaluated at regular periods throughout the month. If cash has accumulated to levels that allow additional investment, TRINITY seeks out the best bond fit for the specific client. TRINITY utilizes a network of broker dealers to find the proper taxable or non taxable bond, given the client's cash needs and future expectations.

VI. Disciplinary Information

TRINITY is not and has not been subject to any disciplinary actions.

TRINITY Capital Investors
1675 Lakeland Drive Suite 400
Jackson, MS 39216

VII. Other Financial Industry Activities

TRINITY is not involved in any other Financial Industry activities.

VIII. Code of Ethics

TRINITY has adopted and enforces a strict Code of Ethics, pursuant to Rule 204A-1, of the Investment Advisors Act of 1940. TRINITY will gladly provide a copy of the code of ethics to anyone upon request.

IX. Brokerage Practices

TRINITY does not direct or recommend broker- dealers for client transactions. TRINITY utilizes a network of broker dealers to allow for best execution on buy and sale transactions.

TRINITY seeks a minimum of 3 bids on all sale transactions and utilizes their network of broker dealers for all buy transactions to ensure best execution. TRINITY does not use or allow a mark up or mark down to accrue benefits for TRINITY. TRINITY seeks most favorable execution on all transactions.

X. Account Review

Each account is reviewed weekly for investment opportunities. Cash balances are tracked to allow TRINITY to make informed investment decisions.

XI. Client Referrals and Other Compensation

TRINITY has not and does not compensate anyone for client referrals.

XII. Custody of Client Assets

Custody and safekeeping of client assets is with a known and experienced custodian, approved depository by State of Mississippi.

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XIII. Investment Discretion

TRINITY accepts discretionary authority over the buying and selling securities. Each transaction is part of a pre-approved plan that clients review on a regular basis. Each client executes an Investment Management Agreement which allows TRINITY to buy and sell and behalf of clients.

XIV. Client Proxy

TRINITY does not and will not vote proxies on behalf of clients. Any proxy material delivered to TRINITY will be forwarded to client for review and execution.

XV. Financial Information

TRINITY prepares selected financial information on an annual basis. The financial information includes, but is not limited to: Balance sheet; profit & loss statement and other information.