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FORM ADV PART 2A - APPENDIX WRAP FEE PROGRAM CLIENT BROCHURE

Trinary Capital, LLC.

2928 Monogram Avenue, Long Beach, CA 90815

www.trinarycapital.com | 1-714-768-3903

This wrap fee program brochure provides information about the qualifications and business practices of Trinary Capital, LLC. (“Trinary”), specifically its wrap fee program. If you have any questions about the contents of this brochure, please contact our Chief Compliance Officer at 1-312-590-7860 or www.trinarycapital.com. The information in this wrap fee program brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Trinary Capital is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Trinary is also available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2 MATERIAL CHANGES

Item 4 - Amended to reflect Trinary Capital's new management fees.broker-dealer relationship with Quartz Partners Investment Management.

Item 6 - Updated descriptions of equity investment strategies and descriptions of example material risks for our clients.

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ITEM 4 SERVICES, FEES AND COMPENSATION

Below are the standard fees generally quoted for prospective clients in Trinary's Roboadvisory wrap fee program. Unless otherwise specified below or in the advisory contract that Trinary enters into with a particular client, Trinary's fees will be automatically deducted from client accounts on a quarterly basis, in arrears. Aside from the wrap fee, clients should not typically incur any additional fees from Trinary or through Trinary's online broker-dealer, Quartz Partners Investment Management (Quartz Partners). Trinary only offers wrap fee Roboadvisory services and, accordingly, any investment advisory services the client seeks from Trinary are offered through the Roboadvisory wrap fee program. The client may be able to utilize Quartz Partner's digital broker-dealer services for their own use or through another third-party that may cost less than Trinary's wrap fee program. The client remains free to open an Quartz Partners account through their website, unaffiliated with Trinary if they so desire; however, the terms and conditions of the wrap fee program and any client advisory agreement pertain only to Trinary's Roboadvisory investment services and not any investment that a client may do on their own or through an unaffiliated third party.

Trinary imposes investment minimums on retail accounts—typically a \$250 minimum deposit for a retail client.

Fees for Institutional Accounts and Retail Client Accounts

When Trinary provides portfolio management services to an institutional or retail client through an Account, Trinary will charge each such Account a fee at a specified annual percentage rate of the account's assets under management. Trinary's standard fee rates for client Accounts are listed below. However, the fees charged to Accounts may be negotiable and may typically vary depending on a number of factors including, but not limited to:

- the type of client;
- whether the client wishes to impose restrictions on the Roboadvisory's discretionary investment authority (*e.g.*, restrictions on the types of securities that the Roboadvisory may acquire for the account); and
- the amount of client assets under management with Trinary.

Standard Rates

\$5,001 - \$10,000 AUM = 1%
\$10,001 - \$15,000 AUM = .9%
\$15,001 - \$25,000 AUM = .8%
\$25,001 - \$50,000 AUM = .7%
\$50,001 - \$250,000 AUM = .6%
\$250,001 AUM and up = .5%

General Information about Fees

Refunds of Pre-Paid and Unearned Advisory Fees. Trinary's advisory contracts with clients typically can be terminated at any time by either party upon written notice to the other party. If an advisory contract is terminated, Trinary will refund to the client any unearned and pre-paid advisory fees. A copy of Trinary's typical client advisory agreement is available on <https://trinarycapital.com/>.

Portfolio Values for Fee Calculations. For purposes of calculating the amount of any asset-based fee owed and payable to Trinary, Trinary generally determines portfolio valuations by looking at a client's account balance.

Services to Employees, Family and Friends of Trinary. Trinary may provide Roboadvisory portfolio management services to certain Trinary principals, employees, and their family members and friends without charge, or for fees that are lower than the fees available to other clients.

Tax Implications - Sale of Existing Positions upon Transition to Trinary. Unless a client otherwise directs Trinary to retain transferred assets when transferring funds to a new Trinary Roboadvisory account, Trinary will sell all securities transferred into an account if Trinary does not believe the securities are suitable or consistent with the Trinary investment strategy most applicable for that client's chosen investment goals. Trinary will then use the proceeds to buy securities appropriate for that client pursuant to the client's questionnaire responses and the Roboadvisory's algorithms. Trinary does not consider tax consequences to a client when selling transferred securities.

ITEM 5 ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Trinary typically requires a minimum deposit of \$250 USD to open a client Roboadvisory account. Trinary reserves the right in its sole discretion to waive account minimums and to create customized investment strategies for clients pursuant to the Roboadvisory algorithmic tool.

The following information describes the types of clients to which Trinary provides portfolio management services.

Institutional Accounts

Trinary will manage an Institutional Account pursuant to the client's responses to the detailed questionnaire filled out during account sign-up and Trinary's proprietary Roboadvisory algorithmic tool. Clients may limit or restrict Trinary's management of the account. However, Trinary reserves the right not to enter into a contract with a prospective client, or to terminate an agreement with an existing client, if the proposed limitation or restriction is likely, in Trinary's opinion, to impair its ability to provide services to a client or is otherwise administratively or practically not feasible. The investment strategies that Trinary utilizes in providing Roboadvisory investment services to Institutional Accounts are described in Item 8 below.

Retail Client Accounts

Trinary will manage Retail Client Accounts pursuant to the client's responses to the detailed questionnaire filled out during account sign-up and Trinary's proprietary Roboadvisory tool. Clients may limit or restrict Trinary's management of the account. However, Trinary reserves the right not to enter into a contract with a prospective client, or to terminate an agreement with an existing client, if the proposed limitation or restriction is likely, in Trinary's opinion, to impair its ability to provide services to a client or is otherwise administratively or practically not feasible. The investment strategies that Trinary utilizes in providing Roboadvisory investment services to Institutional Accounts are described in Item 8 below.

ITEM 6 PORTFOLIO MANAGER SELECTION AND EVALUATION

Trinary Capital, through its proprietary Roboadvisory algorithmic risk tool, directly manages the portfolios of its clients pursuant to each client's Advisory Agreement and in conjunction with each client's unique financial goals and personal information as provided through Trinary's online applications and filtered through the Roboadvisory's investment algorithm. Third party portfolio managers are currently not utilized, selected, or recommended to clients except to the extent Trinary may submit trading orders to its affiliated broker-dealer/custodian (which orders are solely within Trinary's, not the broker-dealer's, discretion). Based on this information, Trinary's Roboadvisory risk algorithm will recommend a portfolio and investment strategy for each of the client's financial goals and account types. Under certain circumstances, based primarily on prior investment experience, Trinary may waive some or all of the selection criteria for any investment described in this Brochure, at their sole discretion, in accordance with an investor's wishes; provided it is deemed suitable for the investor and in their "best interest" according to their investment profile as defined by their answers to the risk questionnaire.

The Roboadvisory algorithmic risk tool continuously reviews clients' accounts to confirm each portfolio meets the targets described by the client's personalized investment goals. If a portfolio deviates from the targets described by a certain set of investment goals, Trinary Capital's Roboadvisory algorithmic risk tool will update and adjust the account's investment strategy(ies) or allocations to better reflect the client's goals. Clients will be automatically notified when this rebalancing occurs. Further, members of the advisory and compliance teams sometimes may conduct focused reviews of accounts when triggered by certain account activity to ensure that account performance is consistent with client guidelines, but clients should be aware that individual accounts are generally not actively monitored directly by investment advisory personnel.

Except for certain relationships, Trinary generally performs advisory services for each client under the terms of an investment advisory agreement with that client—either online or offline. Within a given investment strategy – and consistent with the stated investment objectives, policies and restrictions of that investment strategy – Trinary typically exercises exclusive investment advising discretion regarding the purchase or sale of securities for clients. Trinary may also agree to manage a client's account subject to certain reasonable restrictions that the client imposes on the inclusion of specific securities, or types of securities, within that account. Additional detail about Trinary's investment strategies is provided below.

Performance-Based Fees. Trinary does not charge a performance fee to clients at this time.

Methods of Analysis, Investment Strategies, and Risk of Loss. Trinary's proprietary Roboadvisory algorithmic tool considers a broad range of equity and fixed income investment strategies to align with and best fit a client's unique investment goals. These investment strategies are based upon the answers to the online client questionnaire, which are analyzed according to our proprietary algorithm to assess a client's risk appetite and suitability for certain investments, as well as assess each client's individual goals.

The following is a brief description of some of the primary investment strategies that the Roboadvisory algorithmic tool may utilize in its algorithm pursuant to a client's stated investment goals, including but not limited to the investment objectives that align with each strategy and the material risks associated with an investment in that strategy. There is no assurance that a particular investment strategy or strategies utilized by the Roboadvisory algorithmic tool will meet its investment objectives. Additionally, the investment strategies and techniques that the Roboadvisory algorithmic tool may use for a particular client will vary over time depending on various factors, including, most importantly, the client's investment goals at a particular point in time and changing circumstances and time horizons.

Summaries of investment objectives, principal investment strategies and material risks provided below are necessarily limited and are presented for general information purposes. Consequently, these summaries are in all instances qualified and superseded by the descriptions of objectives,

strategies and risks, portfolio reports, and other communications that are provided to each client in connection with the creation and maintenance of the client's own account with Trinary.

Investing in securities involves the risk of loss of money, and clients investing their money with Trinary should be prepared to bear that loss. The Roboadvisor through which Trinary provides portfolio management services is not a deposit in any bank, nor are they insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency.

Equity Investment Strategies – Objectives, Principal Investment Strategies and Material Risks

Note: The narrative discussion of each equity investment strategy includes a list of the material risks that are associated with an investment in that investment strategy. A description of each of the named risks is included at the end of this Item 8, following the narrative discussion of all the equity, alternative, fixed income, municipal and multi-asset investment strategies.

Trinary Capital Preservation Portfolio—“Ironside” is a diversified portfolio where the equity exposure is minimal compared to the fixed income exposure. The portfolio strives to preserve capital with attention to the effects of inflation to distinguish it from pure cash. The Portfolio is a strategy that seeks stability in volatile markets while pursuing moderate long-term capital appreciation and preservation of principal. The fund is composed of large-cap and mega-cap stocks and ETFs that are optimized to reduce systematic risk. This strategy invests in the largest companies of high quality within the eight largest sectors of the S&P 500. The stock choices consist of healthy companies with robust earnings, stable balance sheets, and efficient capital that together comprise an acceptable level of risk/reward with low volatility and high dividends. This strategy has a beta target to incur far less volatility in normal market conditions than the index and is rebalanced annually. The intention of this portfolio is to have minimum exposure to Beta (market exposure) compared with other risk profiles. The risks of this portfolio includes the risk that its returns will trail those of the market over a given period of time. Investors with significant capital who desire a long-term portfolio to maintain value and minimize downside risk may consider this portfolio. Investors with a very low risk tolerance may use this portfolio.

Trinary Capital Moderate Portfolio—“Caravel” is a diversified portfolio where the equity exposure is higher than that compared to the Preservation Portfolio. . The intention of this portfolio is to have exposure to Beta (market exposure) consistent with its risk profile. The Portfolio is a strategy that seeks stability in volatile markets while pursuing long-term capital appreciation. The fund is composed of large-cap and mega-cap stocks and ETFs that are optimized to reduce systematic risk. This strategy invests in the largest companies of high quality within the eight largest sectors of the S&P 500. The stock choices consist of healthy companies with robust earnings, stable balance sheets, and efficient capital that together comprise an acceptable level of risk/reward with low volatility and high dividends. This strategy has a beta target to incur less volatility in normal market conditions than the index and is rebalanced annually. The risks of this portfolio includes the risk that its returns will trail those of the market over a given period of time yet is engineered to provide protection against downside risk and loss in value in falling markets through dividends and fixed income.

Trinary Capital Growth Portfolio—“Galleon” is a diversified portfolio where the equity exposure is higher than that compared to the Balanced Portfolio. The Portfolio is a strategy that seeks stability in volatile markets while pursuing long-term capital appreciation. The fund is composed of large-cap and mega-cap stocks and ETFs that are optimized to reduce systematic risk. This strategy invests in the largest companies of high quality within the eight largest sectors of the S&P 500. The stock choices consist of healthy companies with robust earnings, stable balance sheets, and efficient capital that together comprise an acceptable level of risk/reward with low volatility and high dividends. This strategy has a beta target to incur less volatility in normal market conditions than the index and is rebalanced annually. The intention of this portfolio is to have exposure to Beta (market exposure) consistent with its risk profile. The risks of this portfolio includes the risk that its returns will trail those of the market over a given period of time yet is engineered to provide protection against downside risk and

loss in value in falling markets through dividends and fixed income. The portfolio is designed for those with high risk profiles.

Trinary Capital Conservative Portfolio—“Dreadnaught” is a diversified portfolio where the equity exposure is higher than that compared to the Preservation Portfolio. The Portfolio is a strategy that seeks stability in volatile markets while pursuing long-term capital appreciation. The fund is composed of large-cap and mega-cap stocks and ETFs that are optimized to reduce systematic risk. This strategy invests in the largest companies of high quality within the eight largest sectors of the S&P 500. The stock choices consist of healthy companies with robust earnings, stable balance sheets, and efficient capital that together comprise an acceptable level of risk/reward with low volatility and high dividends. This strategy has a beta target to incur much less volatility in normal market conditions than the index and is rebalanced annually. The intention of this portfolio is to have somewhat minimal exposure to Beta (market exposure) consistent with its risk profile. The risks of this portfolio includes the risk that its returns will trail those of the market over a given period of time yet is engineered to provide protection against downside risk and loss in value in falling markets through dividends and fixed income. Investors with significant capital who desire a long-term portfolio to maintain value and minimize downside risk may consider this portfolio. Investors with a low risk tolerance may use this portfolio.

Trinary Capital Balanced Portfolio—“Cruiser” is a diversified portfolio where the equity exposure is higher than that compared to the Moderate Portfolio. The portfolio strives for capital appreciation with the respective risk tolerance in mind. The Portfolio is a strategy that seeks stability in volatile markets while pursuing long-term capital appreciation. The fund is composed of large-cap and mega-cap stocks and ETFs that are optimized to reduce systematic risk. This strategy invests in the largest companies of high quality within the eight largest sectors of the S&P 500. The stock choices consist of healthy companies with robust earnings, stable balance sheets, and efficient capital that together comprise an acceptable level of risk/reward with low volatility and high dividends. This strategy has a beta target to incur less volatility in normal market conditions than the index and is rebalanced annually. The risks of this portfolio includes the risk that its returns will trail those of the market over a given period of time yet is engineered to provide protection against downside risk and loss in value in falling markets through dividends and fixed income.

Trinary Capital Aggressive Portfolio—“Flagship” is a diversified portfolio where the equity exposure is higher than that compared to the Growth Portfolio. Trinary Flagship is a strategy that seeks stability in volatile markets while pursuing long-term capital appreciation. The fund is composed of large-cap and mega-cap stocks and ETFs that are optimized to reduce systematic risk. This strategy invests in the largest companies of high quality within the eight largest sectors of the S&P 500. The stock choices consist of healthy companies with robust earnings, stable balance sheets, and efficient capital that together comprise an acceptable level of risk/reward with low volatility and high dividends. This strategy has a beta target to incur a little less volatility in normal market conditions than the index and is rebalanced annually. The portfolio is designed for those with the highest risk profiles.

Descriptions of Example Material Risks

Credit Risk – If debt obligations held by an account are downgraded by ratings agencies or go into default, or if management action, legislation or other government action reduces the ability of issuers to pay principal and interest when due, the value of those obligations may decline, and an account’s value may be reduced. Because the ability of an issuer of a lower-rated or unrated obligation (including particularly “junk” or “high yield” bonds) to pay principal and interest when due is typically less certain than for an issuer of a higher- rated obligation, lower rated and unrated obligations are generally more vulnerable than higher-rate obligations to default, to ratings downgrades, and to liquidity risk. Political, economic and other factors also may adversely affect governmental issues.

Commodity Risk –The investment exposure, even if indirect, mimicked, or through investment vehicles, to the commodities markets and/or a particular sector of the commodities markets may subject investors to greater volatility than investments in traditional securities. The commodities markets are impacted by a variety of factors, including market movements, resource availability, commodity price volatility, speculation in the commodities markets, domestic and foreign political and economic events and policies, trade policies and tariffs, war, acts of terrorism, changes in domestic or foreign interest rates and/or investor expectations concerning interest rates, domestic and foreign inflation rates and investment and trading activities in commodities.

Derivatives Risk –Investments in derivatives involve the risks associated with the securities or other assets underlying the derivatives, and also may involve risks different or greater than the risks affecting the underlying assets, including the inability or unwillingness of the other party to a derivative to perform its obligations to an account, an account's inability to sell, or delays in selling or closing, positions in derivatives, and difficulties in valuing derivatives.

Developing Country Risk – The risks that may affect investments in foreign issuers (see “Foreign Investment Risk,” below) may be more pronounced for investments in developing countries because the economies of those countries are usually less diversified, communications, transportation and economic infrastructures are less developed, and developing countries ordinarily have less established legal, political, business and social frameworks. At times the prices of equity securities or debt obligations of a developing country issuer may be extremely volatile. An issuer domiciled in a developed country may be similarly affected by these developing country risks to the extent that the issuer conducts a significant percentage of its business in developing countries.

Equity Securities Risk –The value of the equity securities the portfolio holds may fall due to general market and economic conditions, perceptions regarding the industries in which the issuers of securities in the ETFs holds participate or factors relating to specific companies. These can include stock movements, purchases or sales of securities, government policies, litigation and changes in interest rates, inflation, the financial condition of the issuer or perceptions of the issuer, or economic conditions in general or specific to the issuer. Equity securities may also be particularly sensitive to general movements in the stock market, and a decline in the broader market may affect the value of equity investments.

Focused Investment Risk – An investment strategy that invests in a focused portfolio of issuers may be subject to increased risk because changes in the value of one of the issuers may have a greater impact on the total value of the portfolio than if the portfolio is invested in a larger number of issuers. Further, to the extent that some of the issuers in the portfolio are in the same or related industries or sectors, any economic, political, regulatory or other event affecting one of those industries or sectors may have a greater impact on the total value of the portfolio.

Foreign Investment Risk – Investments in securities of foreign issuers may involve risks including adverse fluctuations in currency exchange rates, political instability, confiscations, taxes or restrictions on currency exchange, difficulty in selling foreign investments, and reduced legal protection. These risks may be more pronounced for investments in developing countries.

High Yield Risk – Debt obligations that are rated below investment grade and unrated obligations of similar credit quality (commonly referred to as “junk” or “high yield” bonds) may have a substantial risk of loss. These obligations are generally considered to be speculative with respect to the issuer's ability to pay interest and principal when due. These obligations may be subject to greater price volatility than investment grade obligations, and their prices may decline significantly in periods of general economic difficulty or in response to adverse publicity, changes in investor perceptions or other factors. These obligations may also be subject to greater liquidity risk.

Inflation Risk - Inflation is the reduction in the purchasing power of money resulting from an increase in the price of goods and services. Inflation risk is the risk that the inflation adjusted or “real” value of an investment in a stock, mutual fund, or debt security or the income from that investment will be worth less in the future. As inflation occurs, the real value of the stock, mutual fund, or debt security and the dividend payable to holders of the investment or interest payable to holders of debt securities declines.

Interest Rate Risk – When interest rates increase, the value of the account’s investments may decline, and the account’s share value may be reduced. This effect is typically more pronounced for intermediate and longer- term obligations. This effect is also typically more pronounced for mortgage- and other asset-backed securities, the value of which may fluctuate more significantly in response to interest rate changes. When interest rates decrease, the account’s current income may decline.

Liquidity Risk – Due to a lack of demand in the marketplace or other factors, an account may not be able to sell some or all of the investments promptly or may only be able to sell investments at less than desired prices. The market for lower-rated and unrated debt obligations (including particularly “junk” or “high yield” bonds) and debt obligations backed by so-called “subprime” mortgages may be less liquid than the market for other obligations, making it difficult for an account to value its investment in a lower-rated or unrated obligation or to sell the investment in a timely manner or at an acceptable price

Management Risk – Trinary client accounts are actively managed portfolios, and the value of the accounts may be reduced if Trinary pursues unsuccessful investments or fails to correctly identify risks affecting the broad economy or specific issuers in which the accounts invest.

Market and Economic Risk – The value of an account’s investments may decline due to changes in general economic and market conditions. The value of a security held in an account may change in response to developments affecting entire economies, markets or industries, including changes in interest rates, political and legal developments, changes in Federal Reserve policy, and general market volatility.

Prepayment Risk – When market interest rates decline, certain debt obligations held by an account may be repaid more quickly than anticipated, requiring the account to reinvest the proceeds of those repayments in obligations that bear a lower interest rate. Conversely, when market interest rates increase, certain debt obligations held by an account may be repaid more slowly than anticipated, causing assets of the account to remain invested in relatively lower yielding obligations. These risks may be more pronounced for investments in mortgage-backed and asset-backed securities.

Real Estate Risk – Investments in real estate investment trusts (“REITs”) are subject to risks affecting real estate investments generally (including market conditions, competition, property obsolescence, changes in interest rates and casualty to real estate), as well as risks specifically affecting REITs (the quality and skill of REIT management and the internal expenses of the REIT).

Risks Affecting Specific Issuers – The value of an equity security or debt obligation may decline in response to developments affecting the specific issuer of the security or obligation, even if the overall industry or economy is unaffected. These developments may include a variety of factors, including but not limited to management issues or other corporate disruption, political factors adversely affecting governmental issuers, a decline in revenues or profitability, an increase in costs, or an adverse effect on the issuer’s competitive position, or the effects regarding large redemptions by investors in an Issuer’s investment vehicle the portfolio may have holdings in.

Short Sale Risk – A short sale involves the sale of a borrowed security, in anticipation of purchasing that same security at a lower price in the future in order to close the short position. If the value of the borrowed security increases between the date the account enters into the short sale and the date that the account buys that security

to cover its short position, the account may experience a loss.

Smaller Company Risk – Investments in small-capitalization companies and mid-capitalization companies, including smaller, earlier stage companies, may involve additional risks. These risks may be relatively higher with smaller companies. These additional risks may result from limited product lines, more limited access to markets and financial resources, greater vulnerability to competition and changes in markets, lack of management depth, increased volatility in share price, and possible difficulties in valuing or selling these investments.

Structured Products Risk – Investments in structured finance arrangements, including CMOs, CDOs, CBOs and CLOs, involve the risks associated with the underlying pool of securities or other assets, and also may involve risks different or greater than the risks affecting the underlying assets. In particular, these investments may be less liquid than other debt obligations, making it difficult for an account to value its investment or sell the investment in a timely manner or at an acceptable price.

ITEM 7 CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

For purposes of compliance and to best allocate our clients' investments via the Roboadvisory algorithmic risk tool, Trinary must collect an amount of quantifiable data from our clients. There is a strong precedence of this being accomplished through online questionnaires among existing Roboadvisory investment service providers. During the sign-up process, Trinary will obtain from clients all information necessary to maintain regulatory compliance and best serve our clients' intent. Clients can expect to answer questions about their age, annual income, investment goals, marital and familial status, knowledge of financial markets and investing, level of investing experience, expected or desired annual return for long-term investments, largest allowable draw-down on investment accounts, time horizons, and emergency funds, among others. Client information provided through the online questionnaire is then processed by the Roboadvisory algorithmic tool to select an investment strategy or strategies that best aligns with the client's stated investment goals.

Trinary will query new clients via a web interface at www.trinarycapital.com, presenting questions in plain English text, with provisions for disabled accessibility as required. Answers will be provided via text entry dialog boxes, multiple choice radio buttons, and drop-down menus. Information collected will include, though is not limited to: name, age, marital status, children and their ages, income, debt, experience with investing, and financial goals. This information will be used by the Roboadvisory algorithmic tool to develop the client's risk tolerance profile and determine the best allocation of the client's funds pursuant to the client's individualized investment goals.

However, for a retail investor, choosing a financial advisor is akin to choosing a mechanic or doctor. It's a relationship that requires extraordinary trust in the professional to deliver a critical, and often perceived as arcane, service. Building this rapport and trust involves more than a simple questionnaire. To this end, Trinary launched an interactive online questionnaire powered by the Roboadvisory tool. This will provide a more conversational approach, reply to client input in a meaningful way, and ask follow-on questions dictated in part by previous client answers. For instance, it only makes sense to ask about an outstanding mortgage balance if the client has already said he/she has a mortgage.

Diagrammatically, this will follow a tree structure with branching dialogue options depending on the client's responses to previous questions. The prototype dialogue tree currently under development has over one billion unique conversations, each corresponding to a slightly different investor profile. The interface will be the same, relying on questions and responses printed to the client's screen in plain English text and multiple-choice radio buttons or text entry fields to receive client input.

These conversations have been patterned after verbal conversations typical of a client interaction with a financial advisor. This allows the Roboadvisory to gain a deeper understanding of the client's current financial situation, life situation, and financial goals while delivering the family office experience in an automated, web-based environment. Trinary's Roboadvisory algorithmic risk tool can leverage the additional information gained beyond a simple risk assessment and instead create an entire investor profile using a holistic approach of market risk, desire for safety, aspirational goals, and life and family situation, while simultaneously making the client feel more included throughout the interactive process.

Completion of the online interactive survey from start to finish takes about 15 minutes. Clients will be automatically prompted to participate in a similar interactive questionnaire annually to reassess their current investments, track changes to their investor profiles (such as changes to family, life, and income), and assess satisfaction with Trinary's services over the preceding year. Trinary believes regularly engaging our clients in an interactive and automated manner, reminiscent of human conversation, will provide them with higher confidence in Trinary and investing in general, and will help us continue to deliver the best financial advice and investment vehicles to meet their changing financial goals.

Voting Securities. Trinary accepts authority to vote proxies on behalf of its clients in most, but not all client accounts. When Trinary has the authority (which will be set forth in the client's agreement with Trinary), Trinary will follow its written proxy voting policies and procedures ("Proxy Policy"). The Proxy Policy states that proxies are an asset of the account and are to be voted to enhance the value of the security or to reduce the potential for a decline in the value of a security. The Proxy Policy authorizes Trinary to delegate certain functions to service providers.

Trinary will not be able to vote proxies when the proxy materials are delivered late or without enough advance notice for Trinary to evaluate the issues and cast the votes. Trinary does not control the setting of record dates, shareholder meeting dates, or the timing or manner of distribution of proxy materials and ballots relating to shareholder votes. In addition, administrative matters beyond Trinary's control may at times prevent Trinary from voting proxies in certain non-U.S. markets.

Conflicts may arise between Trinary's interest and the interest of clients. When Trinary believes that a proxy vote involves an actual conflict of interest, and the vote relates to the election of a director in an uncontested election or ratification of selection of independent accountants, Trinary votes in accordance with the recommendation of its proxy voting service.

You may request a complete copy of Trinary's Proxy Policy by emailing our Chief Compliance Officer, at jeffwiseman@trinarycapital.com or by sending a written request to Trinary Capital, LLC, Attn: Chief Compliance Officer, 2928 Monogram Avenue Long Beach, CA 90815.

ITEM 8 CLIENT CONTACT WITH PORTFOLIO MANAGERS

Trinary provides all investment advisory services exclusively through its online interface and Roboadvisory algorithmic tool at www.trinarycapital.com. Accordingly, clients should be aware that all investment advisory services will be provided through Trinary's website, not via personal client contact with members of Trinary's investment advisory team.

Clients should also be aware that that Trinary primarily uses electronic rather than telephonic means to provide customer support. Clients may contact an investment advisory team member or member of Trinary's executive team at any time via email or through Trinary's website, and prospective clients should be comfortable communicating through those channels. Generally, however, such communication or customer support is educational in nature only, and although the algorithms that apply to and manage client accounts are overseen, monitored, and updated by investment advisory personnel, Roboadvisory clients will typically not interact directly or face-to-face with such investment advisory personnel. Updates to a client's investment goals or to answers to the client questionnaire may typically be submitted via Trinary's online interface without contacting any investment team member.

Trinary's team endeavors to answer all customer support questions within a reasonable amount of time and where appropriate.

ITEM 9 ADDITIONAL INFORMATION

Disciplinary Information. Neither Trinary nor any of its management persons has been the subject of any material legal or disciplinary action.

Other Financial Industry Activities and Affiliations.

Broker-Dealer

Trinary is in a contractual relationship with Quartz Partners Investment Management, a securities broker-dealer registered with the Financial Industry Regulatory Authority and the Securities and Exchange Commission that operates a digital Roboadvisory platform. The sole function of Quartz is to serve as distributor of the securities of the Trinary Platform through its proprietary platform. Quartz does execute securities transactions for customers, including for the accounts of Trinary's clients. Trinary Capital currently clears through Apex Clearing and uses Apex as their Custodian.

Potential Conflicts of Interest

Jeremy Horton, the CEO of Trinary Capital, also has founded a non-profit 501c3 called the "Sangin Valley Gun Club" (SGVC). SGVC's mission is to provide services to veterans who need help after being afflicted with trauma and other detrimental effects from US operations relating to the War in Afghanistan (Operation Enduring Freedom). A portion of the profits of Trinary Capital are donated to this non-profit every year.

Trinary Capital has a controlling interest in its subsidiary, Trinary Energy, LLC ("Trinary Energy"). Trinary Capital works in conjunction with Trinary Energy to identify, develop renewable energy projects, and obtain funding sources for promoting the use of renewable resources such as solar and battery storage. Trinary Capital does not include or offer any Trinary Energy projects or relationships in its customers' portfolios.

Code of Ethics. Trinary has adopted a Code of Business Conduct and Ethics (the "Code of Ethics") in accordance with rules issued by the SEC under the Investment Advisers Act of 1940. The Code of Ethics was adopted with the objectives of deterring wrongdoing, promoting honest and ethical conduct, and promoting compliance with applicable laws and regulations. The Code of Ethics, among other things:

- defines conflicts of interest;
- restricts certain political contributions;
- prohibits the illegal use of non-public, material information about an issuer of securities;
- restricts the receipt and giving of gifts and entertainment; and
- restricts other activities Trinary views as inconsistent with its obligations to its clients.

Trinary's Code of Ethics is available on its website www.trinarycapital.com under "Legal Disclosures" or Trinary will also provide a copy of the Code of Ethics upon request by emailing our Chief Compliance Officer, at jeffwiseman@trinarycapital.com or by sending a written request to Trinary Capital, LLC., Attn: Chief Compliance Officer at 2928 Monogram Avenue Long Beach, CA 90815.

Review of Accounts. Trinary Capital's Roboadvisory algorithmic tool provides clients with continuous access to their account information through the website interface. Clients will have access to a personalized interface to review their account, to better understand their holdings and performance information, and to update their

personal investment goals and information. Clients will also receive periodic emails from Trinary with information about their accounts as well as links to account statements.

The Roboadvisory algorithmic tool continuously reviews clients' accounts to confirm each portfolio meets the targets described by the client's personalized investment goals. If a portfolio deviates from the targets described by a certain set of investment goals, Trinary Capital's Roboadvisory algorithmic tool will update and adjust the account's investment strategy(ies) or allocations to better reflect the client's goals. Clients will be automatically notified when this rebalancing occurs.

Clients should update their Trinary account information and investment goals via the online interface if any changes occur in their financial situations that may affect Trinary's management of their account. Clients will be automatically prompted to update their personal information and investment goals via the online interface on at least a quarterly basis.

Trinary offers to provide each client account with a quarterly portfolio report. The details may include:

- cash balances;
- type, name and amount of each security;
- portfolio weighting of each security;
- account performance (based upon Trinary's independent valuations – separate from the client's custodian);
- current market value of the portfolio; and
- transactions during the report period.

These materials are provided in addition to the confirmations of transactions and custodial reports the client receives from its custodian.

Client Referrals. Trinary may pay fees to financial intermediaries, advisers, planners and individuals who refer clients to Trinary, in accordance with applicable law. Trinary also pays compensation to its contractually-affiliated broker-dealer, Quartz.

Trinary makes charitable contributions to organizations associated or affiliated with its founders, namely the Sangin Valley Gun Club. A portion of its revenues each year are donated to a 501c3 that aids in helping veterans of the war in Afghanistan to receive the help they need. The Sangin Valley Gun Club is also a non-profit that was started by the majority shareholder of Trinary Capital.

Financial Information. Trinary has no financial commitments that impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

ITEM 10 REQUIREMENTS FOR STATE-REGISTERED ADVISORS

Neither Trinary nor any of its management persons have any relationship or arrangement with any issuer of securities required to be described in this section.