
Trinity Investment Advisors, LLC

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Form ADV Part 2A – Firm Brochure

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This brochure provides information about the qualifications and business practices of Trinity Investment Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 610-344-9300. 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 Investment Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Trinity Investment Advisors, LLC is 141039.

Trinity Investment Advisors, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2: Material Changes

Since the last annual filing of the Form ADV Part 2A, dated March 5, 2019, no material changes have occurred.

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Item 4: Advisory Business

Trinity Investment Advisors, LLC's registration was granted by the U.S. Securities and Exchange Commission on June 30, 2006. Michael Kevin McCabe is Member and chief compliance officer of the firm. Mr. McCabe owns one hundred (100%) percent of the equity of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. The Firm manages each client's portfolio on an individualized basis. Clients may impose restrictions. The firm does not participate in wrap programs.

As of December 31, 2019, the firm managed assets on a discretionary basis in the amount of \$10,000,000 and \$176,000,000 on a non-discretionary basis.

Firm shall primarily engage in the provision of investment supervisory services to its client base. Approximately ninety-five (95%) percent of Firm's professional time and billings shall be attributable to this function. In addition, Firm shall establish professional relationships and alliances with outside third party portfolio managers and shall direct certain advisory clients to such third party management firms for the purpose of having assets placed under management.

With respect to investment supervisory services per se, Firm shall never have any actual or constructive custody of client assets, cash or securities as the professional services of an outside "Qualified Custodial" shall be employed.

An asset based fee, payable quarterly in arrears shall be payable by the client. In most cases, such asset advisory fee shall be debited directly from the client's account. The "Qualified Custodian" shall communicate on a monthly basis directly to the client. Firm shall also, in certain circumstances, refer certain advisory clients to outside portfolio management firms. Such firms shall charge the client an asset based fee and Firm shall share in a portion of such compensation.

Firm shall not vote proxy statements on behalf of advisory clients.

All clients are advised that in addition to paying investment advisory fees to Firm, a second layer of fees will be payable by the advisory client to the investment adviser of mutual funds. In addition to paying an advisory fee, clients invested in mutual funds will bear a proportionate amount of the operating expenses of the various funds in which they are invested, including management fees that are paid to the funds' advisers.

It is further disclosed that the firm shall receive compensation as a result of its involvement in the separately managed account programs.

Client shall enjoy a five (5) business day penalty free right of rescission.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Investment Management Services

An asset based fee, payable quarterly in arrears shall be payable by the client. In most cases, such asset advisory fee shall be debited directly from the client's account.

The asset management fee imposed by firm for non-qualified accounts shall be as follows:

Account Value	Annual Advisory Fee
First \$250,000	1.50%
\$250,0001 - \$500,000	1.25%
\$500,001 - \$1,000,000	1.00%
\$1,000,001 and Above	Negotiable

The asset management fee imposed by firm for 401(k) accounts shall be as follows:

Account Value	Annual Advisory Fee
\$1 - \$5,000,000	0.50%
\$5,000,001 - \$10,000,000	0.45%
\$10,000,001 - \$15,000,000	0.40%
\$15,000,001 - \$20,000,000	0.35%
20,000,001 - \$25,000,000	0.30%
\$25,000,001 and Above	Negotiable

Fees shall never be based upon capital gains or upon capital appreciation of assets. All fees may be negotiable. No fee is prepaid.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not offer performance-based fees.

Item 7: Types of Clients

The types of clients which Firm shall work with shall are pension plans, profit sharing plans, corporations and other business entities.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Our primary method of investment analysis is fundamental analysis. The investment strategy used by Firm will generally be long term purchases which means purchases of more than one year.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Item 9: Disciplinary Information

Criminal or Civil Actions

Trinity Investment Advisors, LLC and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Trinity Investment Advisors, LLC and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Trinity Investment Advisors, LLC and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Trinity Investment Advisors, LLC or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

The Firm will establish material relationships with third party portfolio managers as disclosed above.

Mr. McCabe also owns Trinity Benefits.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Firm has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. Such Code of Ethics is available upon request from any client or prospective client. The firm's Code of Ethics requires the Chief Compliance Officer of the firm to monitor the personal securities transactions of access persons and to require a high standard of professionalism within the firm in its dealings with advisory clients.

Item 12: Brokerage Practices

Because firm may exercise discretionary authority over client assets, it is likely that applicant, without first obtaining specific client consent, may have authority to determine the securities to be bought or sold, the amount of the securities to be bought or sold, the broker or dealer to be used and commission rates to be paid. Firm has a limited trading authorization from advisory clients and has limited discretionary authority. When selecting brokers, applicant shall consider such factors of reputation within the securities industry, track record, service, accessibility and the like. Firm may recommend brokers to advisory clients.

Item 13: Review of Accounts

With respect to investment supervisory (asset management) activity, the advisory client shall receive a monthly account statement from the "qualified custodial firm". Asset management shall be on-going and continuous.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Trinity Investment Advisors, LLC does not accept custody of client funds. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Because firm may exercise discretionary authority over client assets, it is likely that applicant, without first obtaining specific client consent, may have authority to determine the securities to be bought or sold, the amount of the securities to be bought or sold, the broker or dealer to be used and commission rates to be paid. Firm has a limited trading authorization from advisory clients and has limited discretionary authority. When selecting brokers, applicant shall consider such factors of reputation within the securities industry, track record, service, accessibility and the like.

Item 17: Voting Client Securities

We do not vote Client proxies.

Item 18: Financial Information

Firm does not receive fees more than six months in advance. As such, no financial information is required in this brochure.