

# **Trinity Financial Partners II, LLC**

Investment Advisor

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Form ADV Part 2A  
March 20, 2023

This brochure provides information about the qualifications and business practices of Trinity Financial Partners II, LLC. If you have any questions about the contents of this brochure, please contact us at 610-687-8040. Registration does not imply a certain level of skill or training. 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 Financial Partners II, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 - Material Changes:** There have been no material changes since the last filing.

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## **Item 4 – Advisory Business**

### **History and Ownership**

Trinity Financial Partners II, LLC (the “firm”) is a Pennsylvania domiciled, SEC registered investment advisor that provides fee-based financial planning, investment management, and risk protection planning. The Investment Advisor Representatives maintain insurance and securities licenses to enable the firm to provide comprehensive design, implementation, and ongoing monitoring of a full spectrum of financial services. It can trace its origins back to 1972 when its predecessor firm, REG Financial, Inc was founded by Robert E Gladden. Christopher Gleeson, CLU, ChFC purchased ownership, operating as Christopher Gleeson, a sole proprietorship until March 2010 when Robyn Jameson, CFP®, CLTC joined as an owner and the present firm, Trinity Financial Partners II, LLC was established. Today the firm’s principal shareholder is Robyn E. Jameson, CFP®, CLTC.

### **Services Offered**

Trinity Financial Partners II, LLC furnishes investment and financial advisory services to meet the individual needs of its clients through one or more of the following: The Trinity Wealth Financial Planning System (a web-based tool for aggregating client accounts and data, modeling, storing and easily accessing client financial information), the DOS Conversation, the Discovery Agreement, the Trinity Client Roadmap, Investor Risk Assessment/ Definition, and Goal Clarification Tools.

The firm holds itself to a Fiduciary Standard. This compels the firm and each of its associates to act in good faith and according to the highest standards serving clients’ best interests. These clients have placed their trust and confidence in Trinity and its associates to avail themselves of the superior knowledge, training, experience and caring attitude possessed by the firm and its associates.

The firm provides investment services to clients via a discretionary account agreement (this is discussed further in Item 16 below). Trinity Financial Partners II, LLC may direct clients to third-party investment advisers or subadvisors. Before selecting other advisers for clients, Trinity Financial Partners II, LLC will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where Trinity is recommending the adviser to clients. When using a third-party money manager, clients will sign a contract with both Trinity and the third-party manager. When using a subadvisor, clients will sign a contract with Trinity and the subadvisory relationship will be memorialized in an agreement between Trinity and the subadvisor.

In addition to the firm’s registration as an investment advisor, the firm and its associated personnel may register or meet certain exemptions to obtain registration in other states in which they conduct business.

### **Process**

The below describes Trinity’s typical client engagement process. Some of all of this can be modified, substituted, or deleted based on the individual client engagement:

The Initial Client Interview is conducted to include the DOS Conversation. This is similar to a personal SWAT analysis of the client situation seeking to develop an understanding of the client’s Dangers, Opportunities, and Strengths. Financial data is assembled, and client goals described at a high level. The firm’s “on boarding process” is then presented. This includes an overview of the Trinity Client Roadmap (CER) which is a one-page (18-month) graphic that serves to incorporate “bite size” meetings, each with a clearly defined agenda and purpose. The client is also introduced to the web-based Trinity Wealth Financial Planning System. A planning fee is quoted to the client to go through the planning and onboarding process, a copy of the Trinity Advisory Agreement is reviewed, and the firm’s ADV Part 2A brochure and 2B brochure supplement is given to the client (or e-mailed as a follow-up to the meeting). There is no charge for this initial meeting.

A follow-up email or letter is sent to the client generally within 48 hours of the first appointment, together with the firm’s ADV Part 2, and a client-specific Trinity Advisory Agreement. When the client gives his/her approval, the engagement begins.

The next meeting is an in-depth Fact Finding Meeting. Copies of documents such as wills, trusts, investment statements, tax returns, insurance policies, company benefits, income and expenses are obtained. Sometimes this document exchange happens at the first meeting or in between meetings. Discussion tools include the Client’s Family Story and a comprehensive Risk Profile. Other important topics often include retirement, risk protection, college funding, estate planning, charitable giving and investment objectives.

The next meeting is the Working Session. A first draft of the Client Engagement Roadmap personalized to the client is reviewed along with a restatement of goals and objectives of the client. Information on the client's Trinity Wealth website is reviewed for accuracy and reasonableness of assumptions. This information is loaded into the system by Trinity professionals. The client's balance sheet (assets and liabilities) is reviewed for accuracy and completeness. We review current and future cash flow modeling (all income and expense sources by year) both pre- and post-retirement. This is an interactive and collaborative process with the client where modeling changes are made "on the fly", while working together at the same table. The goal of the Working Session is to hone in on the client's Base Financial Plan. This provides the foundation at future meetings to model in depth "what-if's" surrounding life decision points such as retirement, estate planning, death, disability, education planning, charitable planning and business succession planning, as appropriate.

The next Roadmap Meeting picks up the agenda laid out on the Trinity Client Roadmap. Planning topics are laid out according to a priority sequence. Highest impact areas come first. Each planning area/topic is modeled in depth, and then one or more implementation solutions are laid out by the advisor to meet the client's goals. Specific vehicles utilized in the Trinity Implementation Process include: diversified mutual fund and exchange traded fund (ETF) allocation programs and separately managed accounts utilizing a third party manager of managers platform and also Trinity-managed accounts. Investment implementation can include individual equities/stocks (domestic and foreign), bonds (corporate, municipal, and government issues), alternative investments (such as private equity, real estate, commodities and hedge fund or funds), mutual funds, and exchange traded funds (ETF). Based on the program utilized, clients may impose restrictions on investing in certain securities or types of securities/industries including various ESG screens. Variable and fixed annuities, fixed and variable life insurance, interests in partnerships investing in real estate and oil and gas interests may also be discussed as implementation options. Additionally, life, disability and long-term care insurance will be reviewed. The client is free to accept or reject any recommendation made by Trinity Financial Partners II, LLC. The firm does not provide legal or accounting services. With the client's consent, the firm may work with the client's other advisors (accountant, attorney, business consultant, etc.) to assist with coordination and implementation of the accepted strategies.

The Roadmap Review is an important part of the Trinity planning process. This is a quarterly, semi-annual or annual meeting that is offered in which the Trinity Client Roadmap and client goals and objectives are reviewed, along with the Trinity Wealth Planning System (a recasting of financial modeling based on changes in the market/economy, changes in life situation or changes in the goals of the client). Also, investment performance and asset allocation may be reviewed, along with insurance coverage. Typically, every 18-24 months, a Fire Drill process identifies who does what in the event of the death or disability of one or both spouses. After each client meeting, a letter goes out to the client summarizing what was discussed, as well as action items for the client and for the firm.

### Wrap Fee Programs

A wrap fee program is an investment program wherein the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. Trinity Financial Partners II, LLC does not participate in any wrap fee programs as a sponsor or portfolio manager, but Trinity may recommend third-party money managers that manage wrap fee programs.

### Assets Under Management

As of January 1, 2023, the firm oversees \$382,302,493 in Regulatory Assets Under Management (AUM).

## **Item 5 Fees and Compensation**

### **Financial Planning and Consulting Fees**

The firm brochure must be provided at the time of entering into a contract. The client has the right to terminate the contract without penalty within 5 business days.

The firm's fee-based planning schedule is as follows:

### **Trinity Financial Partners II, LLC**

#### **Fee Schedule**

		<b><u>NET WORTH</u></b>		
		<b>\$0 to <u>\$5,000,000</u></b>	<b>\$5,000,001 to <u>\$10,000,000</u></b>	<b><u>\$10,000,001+</u></b>
<b>Gross Income</b>	<b>\$0-\$100,000</b>	<b>\$2,000 to \$4,500</b>	<b>\$2,500 to \$6,000</b>	<b>\$3,000 to \$6,500</b>
<b>Gross Income</b>	<b>\$100,001 – \$200,000</b>	<b>\$2,000 to \$5,000</b>	<b>\$3,000 to \$7,000</b>	<b>\$3,500 to \$8,000</b>
<b>Gross Income</b>	<b>\$200,001 – \$300,000</b>	<b>\$2,500 to \$5,500</b>	<b>\$3,000 to \$7,500</b>	<b>\$3,500 to \$9,500</b>
<b>Gross Income</b>	<b>\$300,001+</b>	<b>\$3,000 to \$6,000</b>	<b>\$3,500 to \$8,500</b>	<b>\$4,000 to \$12,000+</b>

Fees for services are based on income, net worth and estimated time for preparation/meetings in the planning process and may be higher or lower than the indicated range based upon the specific characteristics of the individual situation. Fees are negotiable at the discretion of the firm principals. Occasionally, the firm will be asked to work on an hourly engagement, in which rates will be charged at \$300/hr for Principals or Senior Financial Advisor and \$115/hour for Staff. Sometimes the firm charges as a % of assets we don't manage if we are only doing financial planning and not investment management as well.

### **Investment Management Fees**

Discretionary Investment management as indicated on the Trinity Advisory Agreement Form. Ongoing asset-based investment advisory fees (exclusive of the service provider's internal charges: SEI, Morningstar, Brinker Capital, Schwab, RBC, Guideline, American Funds, etc.) is charged as follows: Assets up to \$1,000,000 - 1% per year; Assets between \$1,000,000 and \$3,000,000 -.8% per year; Assets in excess of \$3,000,000 – .5% per year. This is a blended fee schedule. For example, if a client has \$5M under management with Trinity, the first \$1M is at 1%, the next \$2M are at .80% and the balance over \$3M is at .50%. Each custodian directly debits the firm fees from each client's account. There is a segment of legacy clients with Morningstar Managed Portfolios/Schwab that our advisory fee is charged between 1% - 1.10%.

Firm fees are deducted from the account differently by each custodian:

- SEI Private Trust: Fees are paid on a quarterly basis in arrears based on the value as of the last day of the quarter.
- Brinker Capital: Fees are paid quarterly in advance and are based on the net asset value of the account on the first business day of each calendar quarter.
- Morningstar Managed Portfolios: Fees are paid quarterly in arrears based on the average daily balance for the applicable period.
- Schwab: Fees are charged quarterly in advance based on the prior period's ending balance.
- RBC: Fees are charged quarterly in arrears based on the prior period's ending balance.
- Guideline: Fees are charged quarterly in arrears based on the average daily balance for the applicable period.
- American Funds: Fees are charged quarterly in arrears based on the average daily net asset value for the applicable period. Quarters end the last business day of February, May, August and November.

Firm fees are disclosed on the client statements and calculated by the service provider based on the above fee schedule. The client will be required to authorize the firm in writing to allow the broker/dealer or custodian (collectively, "service provider") to deduct the firm's advisory fees from the client's account. Clients may incur additional investment management fees, custodian fees, transaction fees and/or mutual fund expenses. These are detailed on the providers new account form or account proposal and are reviewed at the time of the account opening. Investment Advisory Fees paid to Trinity are inclusive of advisory fees paid to subadvisers, however subadvisers will assess portfolio or platform fees on client accounts that will vary depending on the specific portfolios selected for clients. Portfolio selections will always be made in the client's best interest.

Investment Advisory Fees paid to Trinity are exclusive of the advisory fees of third-party money managers. The agreement between the client and the third-party money manager will outline the fee schedule of the third party money manager.

#### Termination of Investment Management Fees

The client has a right to terminate this agreement without penalty within five (5) business days after entering into this agreement. A client agreement may be terminated by any of the parties, for any reason, upon receipt of 10 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. If an account is terminated with a custodian that deducts fees in advance, the client will be entitled to a prorated refund of any pre-paid quarterly fee based upon the number of days remaining in the quarter after the termination date. Upon notification of client's death, all trading activity will cease until TFP II/IAR has received instructions for termination or distribution from the fiduciaries of the estate.

#### Additional Compensation

Investment advisors of Trinity Financial Partners II, LLC accept compensation as registered representatives of broker-dealer based investment products including mutual funds, 529 mutual fund sales, annuity sales, variable life insurance and alternative investment sales. If the firm or any member is compensated for the sale of a mutual fund, variable annuity or alternative investment, then the asset-based supervisory fee will not also be charged on these assets. This presents a conflict of interest and is disclosed upfront to the client. On rare occasions, and when the situation is discussed and agreed to in advance, an asset-based supervisory fee may be added to an account previously charged an upfront commission. Clients are under no obligation to implement plans or strategies through the firm, but are free to choose brokers or agents not affiliated with the firm.

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

The firm's investment management service fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of funds of an advisory contract, also known as performance-based fees.

#### **Item 7 – Types of Clients**

The firm's clients are generally individuals, high net worth individuals, families, closely held business owners, pension and profit sharing plans, estates and foundations. Clients are expected to provide an adequate level of information and supporting documentation to the firm throughout the engagement. The firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise may be determined by the firm principal. The firm reserves the right to decline services to any prospective client for any reason.

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

Trinity Financial Partners II, LLC can utilize service providers of goals-based investment programs matched to the various objectives of each client. The firm strives to implement risk-reduction measures such as proper diversification and asset allocation according to the time horizon of each objective, as well as dollar cost averaging.

Diversification may not protect against market risk, and investing in securities involves risk of loss that clients should be prepared to bear. The firm, along with outside investment service providers, provide the following methods of analysis when managing assets:

- 1) Asset Allocation – Creating strategies with appropriate diversification among asset classes and between investment approaches, both of which are critical drivers of investment success.
- 2) Portfolio Design – Identifying alpha sources, or returns in excess of benchmark returns across equity, fixed-income and alternative investment portfolios.
- 3) Investment Manager Selection – Evaluating individual holdings in addition to monitoring manager performance.
- 4) Portfolio Construction and Management – Using investments with complementary objectives designed to ensure diversification of risk and return within the portfolio.
- 5) Tax Management – As appropriate, helping investors to keep more of what they earn through year-round efforts to reduce tax obligations within client portfolios.
- 6) Risk Management – Overseeing each manager’s investment approach in alignment with the objectives of that segment of the portfolio.

## **Item 9 – Disciplinary Information**

Trinity Financial Partners II, LLC has not been the subject of a reportable legal or disciplinary event pursuant to the Investment Advisors Act of 1940 (as amended) or similar state statute. Any individual reportable violations or disciplinary actions are described in the accompanying ADV Part 2B *Advisory Personnel Brochure Supplement*.

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

Robyn Jameson is a registered representative with Kestra Investment Services, LLC, a Broker Dealer. When securities or other products are bought or sold in the capacity of a Registered Representative, commissions are earned. These are paid according to a published schedule and are independent from the asset-based supervisory fees of Trinity Financial Partners II, LLC. Asset-based supervisory fees are not charged on these products. Trinity Financial Partners II, LLC is not affiliated with Kestra Investments Services, LLC.

Trinity Financial Partners II, LLC utilizes the advisory services of Brinker Capital, Morningstar Managed Portfolios and SEI Private Trust Company, Schwab, Guideline and American Funds. When appropriate, the firm will utilize trust services provided by RBC Trust Company and SEI Private Trust Company. Trinity Financial Partners II, LLC will only utilize Investment Advisory firms that are registered to do business in PA.

Investment advisor representatives of the firm may hold individual membership or serve on boards or committees of professional industry associations such as the Financial Planning Association (FPA); Philadelphia Estate Planning Council (PEPC), or the Certified Financial Planner Board of Standards, Inc. Generally, participation in these entities requires membership fees to be paid, adherence to ethical guidelines, as well as experiential and educational requirements.

Investment advisor representatives of the firm, in their individual capacities, are agents for various insurance companies. As such, these individuals are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any and all recommendations is solely at the discretion of the client.

Since the firm offers fee-based financial planning and consulting services in addition to the implementation of various investment and insurance products, a potential conflict of interest may exist. Trinity Financial Partners II, LLC endeavors at all times to put the interests of its clients first as part of our fiduciary duty as a registered investment advisor. We take the following steps to address conflicts of interest that may arise:

- we disclose to clients the existence of all material conflicts of interest, including the potential of our firm and our employees to earn compensation from advisory clients in addition to our firm’s advisory fees;
- we collect, maintain and document accurate and complete relevant client background information including investment objectives and risk tolerance and time horizon;

- we require that our employees seek prior approval of any outside business activity so that we may ensure that any conflicts of interest in such activities are properly addressed;
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

The firm recognizes that should it act as the advisor to the sponsor of an ERISA-qualified retirement plan (i.e., 401(k) or pension plan) and one of its investment advisor representatives serves in an advisory capacity to one or more of the plan's participants, a potential or implied conflict of interest may occur. The firm will allow the dual advisory role to continue without double charging the client/employee participant twice for service on this account.

## **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics**

Our firm has adopted a Code of Ethics which sets forth high ethical and fiduciary standards of business conduct that we require of our employees.

A copy of our Code of Ethics policy is available to our advisory clients and prospective clients upon request. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm upon hire and we annually review the Code of Ethics policy during our firm Compliance Meeting. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. It also requires prior approval of any acquisition of securities in a limited offering (e.g., private placement) as well as oversight, enforcement and recordkeeping provisions.

### **Participation in Client Transactions and Personal Trading**

The Code of Ethics policy of our firm is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with making decisions in the best interest of advisory clients and also implementing such decisions while, at the same time, allowing employees to invest for their own accounts. The firm and its related persons may buy or sell securities similar to those recommended to clients for their accounts. The firm may also make recommendations or take action with respect to investments for its clients that may differ in nature or timing from recommendations made or to actions taken for other clients or its employees. However, at no time will the firm or any related party receive preferential treatment over its clients. All outside brokerage accounts of registered and non-registered firm employees are monitored through Kestra Investment Services, LLC and by the Trinity Financial Partners Chief Compliance Officer. Personal financial transactions and related activities must be conducted consistent with the Code of Ethics policy, the Federal Securities Laws and in such a manner as to avoid any actual or potential conflict of interest or abuse of the Company's position of trust and responsibility. Associates will place the interests of Clients before their own.

## **Item 12 – Brokerage Practices**

### **Factors used to select broker dealers or custodians**

Trinity Financial Partners II, LLC utilizes various service provider custodian platforms and third-party investment managers, and therefore, does require directed brokerage involving its accounts in accordance with the policies and procedures of each platform. For example, Charles Schwab is required to be used for client accounts within an individual stock or ETF program managed by Morningstar Managed Portfolios and Fidelity is required to be used for all accounts managed by Brinker Capital.

Additionally, there are a number of client accounts where Trinity Financial Partners II, LLC is the direct portfolio manager and directs that these accounts be held at either SEI Private Trust Company or Schwab, with are considered by our firm to be best execution custodian platforms for our clients. Trinity Financial Partners II, LLC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker dealer/custodian.

### **Research and Other Soft Dollar Benefits**

Trinity Financial Partners II, LLC does not have any formal Soft Dollar arrangements.

Investment advisors of Trinity Financial Partners II, LLC are also registered representatives with Kestra Investment Services, LLC; a Broker Dealer. Kestra Investment Services, LLC provides registered representatives a discount to several vendor relationships:



1. Albridge/PartnerView – an aggregation and reporting system for clients accounts which shows all positions owned by the client on one report as well as historical performance information against various benchmarks.
2. A discount to utilize the eMoney Advisor financial planning software. The firm refers to this planning tool as the “Trinity Wealth Management Planning System”.
3. Laserfiche – a compliance-approved electronic filing system which allows the firm to keep in proper compliance regarding clients records (i.e. correspondence, copies of paperwork, copies of checks, advisory agreements, etc.).

SEI Private Trust Company provides Trinity Financial Partners II, LLC (see additional information in Item 14 below):

1. A discount to utilize Redtail CRM – a client management database which allows the firm to track all client information and keep accurate records of transactions, follow-up notes internal action items, and communication with clients.
2. Investment research through the Mornistar Principia Pro tool as requested.
3. Finametrica Annual Subscription (risk profiling tool).
4. Marketing reimbursements for client or prospecting events.
5. Access to quarterly, compliance-approved client newsletters, periodic investment updates and white papers.

Brinker Capital provides Trinity Financial Partners II, LLC:

1. Analysis of outside qualified retirement plans upon request.
2. Access to quarterly, compliance-approved client newsletters and periodic investment updates.

Morningstar Managed Portfolios provides Trinity Financial Partners II, LLC:

1. Access to periodic investment commentaries.

Trinity Financial Partners II, LLC utilizes, as appropriate, the above resources to service all client accounts. The firm periodically conducts an assessment of each strategic partner such as SEI Private Trust Company, Brinker Capital, Morningstar Managed Portfolios, Schwab, Guideline, American Funds and RBC Trust Company to evaluate the range of services and capabilities, portfolio performance and the reasonableness of fees in comparison to other industry providers.

#### Client Referrals

Client referrals are generally not provided from a broker-dealer or third party, therefore, there is no conflict of interest regarding the recommendation of a certain third-party manager in exchange for client referrals. The one exception is SEI Private Trust Company, which has occasionally referred clients to Trinity Financial Partners. These referrals are a result of Trinity’s geographic proximity to SEI as well as its reputation for independent and comprehensive fee-based financial planning services.

#### Directed Brokerage

Trinity will require clients to use specific broker dealers or custodians.

#### Trade Aggregation

Transaction fees for each client account will be fully disclosed. Most accounts aggregate transaction fees within the asset-based management fee. If this is not aggregated under the asset-based management fee, this will be disclosed to the client in advance.

### **Item 13 – Review of Accounts**

Client accounts are monitored regularly:

1. All accounts are reviewed at the client’s request, and reviews are offered to all clients in writing (e-mail) at least annually.
2. All accounts are reviewed when significant changes take place in a client’s situation that we are made aware of (i.e. retirement, relocation, employment change, divorce, death of a spouse, etc.).

For asset-based supervisory accounts, SMAs, mutual fund accounts, and Trinity Financial Partners II, LLC managed accounts, Robyn Jameson is the primary reviewer of all client accounts and makes all final decisions with regard to any changes that should be made to a client’s securities portfolio (this is apart from the third party portfolio management over the accounts).

Trinity Client Relationship Managers assist in reviewing the accounts and implementing recommendations. Their primary function is to document any telephone and written communication with clients, review client statements, assemble client account information and research any costs associated with recommended repositioning of investment assets. In addition, they process and complete forms, prepare reporting for meetings and typically sit in on client meetings. Client Relationship Managers do not fulfill any of the functions of an "investment adviser representative" as noted under Section 102(j) of the PA Securities Act of 1972.

All client accounts receive monthly, quarterly, and/or annual statements directly from the investment company and/or insurance carrier. In addition, the firm provides an annual summary of this information to the client at their annual review (if the client chooses to conduct a review). This summary shows all accounts aggregated together in one report with performance against benchmarks as well as all positions within each account and the overall asset allocation mix of the accounts.

Clients that are on the Trinity Wealth Management Planning System also have a personalized website where all accounts are aggregated together and values are updated every night (including accounts held outside of Trinity Financial Partners II, LLC if the client chooses to link them in directly).

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

The firm does not currently engage third party solicitors as defined by Rule 206(4)-3 of the Investment Advisors Act of 1940, or similar state statute.

The firm will occasionally receive an economic benefit from actively managed account programs such as meals and tickets to athletic events. Please review Item 12 for additional information on the benefits and services we use from various investment managers/custodians.

Trinity Financial Partners II, LLC has access to a variety of economic benefits, services, and products in connection with the use of SEI's investment adviser platform. The terms and availability of these benefits vary among advisors on the SEI platform depending on the business conducted with SEI and other factors. These services generally help Trinity Financial Partners II, LLC conduct its advisory business, but each specific benefit does not necessarily benefit each client.

Beyond access to SEI investment products, these include conferences, seminars and other educational and networking activities, business entertainment, reimbursement of travel and attendance expenses, research and other investment support services (such as client proposal and other financial planning support), technical and operational solutions (including the SEI Wealth Platform), marketing assistance (including joint marketing designed to promote SEI's investment products), compliance services, human resources consulting, risk management/insurance assistance, front office, middle office, back office and other administrative support, SEI attendance at client meetings, information technology services, continuity and succession planning, access to financing and banking options, trust services, portfolio reporting, automatic rebalancing, tax loss harvesting, waiver or payment of certain fees (including paying account transfer fees or other charges that Trinity Financial Partners II, LLC or its clients would incur when changing service providers), vendor discounts, discount pricing on SEI services, and broader practice management consulting. These benefits may be provided via SEI, its affiliates, or third parties and may be made available to Trinity Financial Partners II, LLC at no fee, at a discounted fee, or via financial compensation provided by SEI. Some of these offerings depend on Trinity Financial Partners II, LLC having a minimum amount of assets under management with SEI or invested in SEI investment products. Certain of these services or products, including those provided by or paid for by SEI, may be used by Trinity Financial Partners II, LLC in connection with its general business activities, in addition to supporting Trinity Financial Partners II, LLC's interaction with SEI systems. The benefits, services, products, or payments discussed herein may be significant to Trinity Financial Partners II, LLC and create an incentive for our firm to utilize SEI services or investment products for its customers rather than other service providers or investment products. However, Trinity Financial Partners II, LLC strives at all times to put the interests of its clients first, including when selecting custodians or investment products for clients. Trinity Financial Partners II, LLC is independently owned and operated; it is not affiliated with SEI.

#### **Item 15 – Custody**

Client funds and securities will be maintained by unaffiliated, qualified custodians; banks, broker/dealers, insurance, mutual fund company or actively managed account programs and not with or by Trinity Financial Partners II, LLC or any of its associates.

Clients will be provided transaction confirmations and summary account statements directly from their selected service provider. Typically, these statements are provided on a monthly or quarterly basis, and as transactions occur. Clients are reminded to inform the firm if they do not receive these statements in a timely fashion. For those clients that elect to receive electronic statements from the selected service provider, they must ensure maintenance of a current e-mail address with that entity.

Clients may receive periodic reports from Trinity Financial Partners II, LLC that summarize account performance. Clients are urged to compare their account statements received from the assigned service provider with the performance reports they receive from the firm for accuracy.

#### **Item 16 – Investment Discretion**

Trinity Financial Partners II, LLC provides investment services to clients via a discretionary account agreement.

Also, if an actively managed account program is selected for a client, this provider will have discretion over individual securities and fund selection, rebalancing accounts, etc. This will typically follow a written investment policy statement created for each client account based on risk tolerance, time horizon, etc.

In a discretionary capacity, the client authorizes TFP II/IAR to investigate, purchase, and sell on behalf of Client, various securities and investments. TFP II/IAR is authorized to execute purchases and sales of securities on Client's behalf without consulting Client regarding each sale or purchase. In the case of Separately Managed Accounts, this includes account reallocations as well as manager changes.

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

##### **Proxy Voting**

Trinity Financial Partners II, LLC will not accept authority to vote client securities by proxy. Clients will receive proxies or other solicitations directly from their custodians. Clients are welcome to contact Trinity Financial Partners II, LLC if they should have any questions regarding proxy mailings received in the mail.

For SEI Managed Accounts:

SEI Investments Management Corporation (SIMC) has hired a third-party proxy voting service to vote proxies with respect to applicable SIMC clients in accordance with approved guidelines. SIMC also has a proxy voting committee, comprised of SIMC employees, which approves the proxy voting guidelines or approves how SIMC should vote in certain scenarios. SIMC believes that by using a third-party proxy service to vote proxies in accordance with pre-approved guidelines, it significantly reduces the chance that SIMC's proxy votes will be influenced by a conflict of interest. SIMC retains the authority to overrule the third-party proxy service's recommendation, in certain/limited scenarios and instruct the third-party proxy service to vote in a specific manner.

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

Trinity Financial Partners II, LLC neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

Neither Trinity Financial Partners II, LLC nor its management has any financial condition that is likely to reasonably impair Trinity Financial Partners II, LLC's ability to meet contractual commitments to clients.

Trinity Financial Partners II, LLC has not been the subject of a bankruptcy petition.

#### **Trinity Financial Partners - Privacy Policy**

The following privacy policies apply to clients of TFP II, LLC who obtain or apply for a financial product or service, engages the firm in planning services, or have done so in the past. They do not apply to any outside business activity your financial advisor may engage in separate from TFP II, LLC.

The types of personal information we collect and share depend on the product or service we provide to you. This information can include:

- Name, address, Social Security number, email address
- Net worth, income, assets, account transactions and balances and medical information (for insurance products)
- Investment experience and risk tolerance

We collect your personal information, for example, when you:

- Open an account or enter into an investment advisory contract or financial planning engagement
- Purchase investment and insurance products or seek advice about your investments
- Provide us information on applications, questionnaires, or other forms, websites or through discussions with our customer support staff or your financial advisor

Should you *no longer* be a client to our firm, we will continue to adhere to the policies and practices described in this notice. Upon termination of your relationship, we may share information with any new broker-dealer, investment adviser or custodian that you select for purposes of transferring your account. To the extent we dispose of any information once you end your relationship with TFP II, LLC, we will do so in accordance with applicable law.

All financial companies need to share personal information to run their everyday business. TFP II, LLC may share your information with third parties for our everyday business purposes -- such as to process your transactions, maintain your account(s), and respond to regulatory authorities, court orders and legal investigations.

To protect your personal information from unauthorized access and use, we use security measures that comply with applicable law. These measures include computer safeguards and secured files and buildings. When we share information with third parties, we hold all such parties to the same or higher standards as we do ourselves regarding the privacy of your information. We have policies designed to ensure only those persons who need your information to perform their job have access to it. In addition, we maintain physical, electronic and procedural security measures that comply with applicable regulations to protect your information. We train our employees in the proper handling of personal information. Each Trinity employee also signs a confidentiality agreement.

TFP II, LLC clears investment advisory account business through third-party custodians. Our financial advisors may provide you a consolidated financial account report or other summary of your accounts as a courtesy and for informational purposes. These reports could include assets that are not held by or through TFP II, LLC and are not covered by the Securities Investor Protection Corporation (SIPC). These reports also often contain manual entries of assets not with Trinity, and Trinity is not responsible for the accuracy of the manual entries on client net worth statements that are provided to us by the client. You should always refer to your original statements from companies that maintain custody of your assets to confirm the amount and value of investments held by all companies.

You should always keep your financial advisor informed of any changes to your life circumstances and investment objectives. Please call your financial advisor at 610-687-8040 to discuss any such changes or if you have any questions or concerns regarding your account.