121 COUNTRYSIDE COURT, STE 140
SOUTHLAKE, TX 76092
817-416-5970
817-336-5736

Dated March 1st, 2024

John Allen Chalk, Jr., CPA, JD, CFP®^*
Jeffrey Lee McCain*
Annette Christine Hamil, CPA, MBA
Max William May*

Purpose of the Brochure Supplement:

This brochure supplement provides information about our personnel listed above that supplements the Trinity Portfolio Advisors, LLC (TPA) brochure. You should have received a copy of that brochure. Please contact Jeri Liedl at (817) 416-7227 if you did not receive Trinity Portfolio Advisor's brochure or if you have any questions about the contents of this supplement.

Additionally, a Summary of Professional Designations is included with this Part 2B Brochure Supplement. The list is provided to assist you in evaluating the professional designations held by our investment professionals.

Additional information about our personnel is available on the SEC's website at www.adviserinfo.sec.gov.

^Principal/Founder
*Investment Committee Member for Trinity Portfolio Advisors, LLC which oversees policy as well as strategic and tactical direction for the firm's investment portfolios.

John Allen Chalk, Jr., CPA, JD, CFP®

Born: 1963

Chief Executive Officer

Educational Background and Business Experience

Post-Secondary Education:

- Abilene Christian University, BBA, Accounting, 1986
- University of Texas, Juris Doctorate (JD), 1991

Recent Business Experience:

Trinity Portfolio Advisors, LLC	10/2009 to present	Owner/Member
MML Investors Services, Inc	01/2001 – 01/2010	Registered Representative

Professional Designations:

John Allen Chalk, Jr. has earned the **Certified Public Accountant (CPA)** and **Certified Financial Planner (CFP®)** designations and is in good standing with the granting authority.

Disciplinary Information

John Allen Chalk, Jr. has no reportable disciplinary history.

Other Business Activities

John Allen Chalk, Jr. is engaged in investment-related business outside of his role with Trinity Portfolio Advisors, LLC. Mr. Chalk, in his individual capacity, is also a licensed insurance agent with Mass Mutual Financial Group and various other insurance companies, and in such capacity, may recommend, on a commission basis, the purchase of certain insurance products. Although TPA does not sell such insurance products to its investment advisory clients, TPA does permit its *Advisory Affiliates*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A potential conflict of interest may exist to the extent that Mr. Chalk recommends the purchase of insurance products where he receives insurance commissions or other additional compensation from insurance companies.

John A. Chalk, Jr., is a licensed practicing attorney admitted to the Bar of the State of Texas. Mr. Chalk maintains a limited legal practice, separate and distinct from TPA's investment advisory activities. TPA may, from time to time, recommend certain of its clients to Mr. Chalk for various legal services. Mr. Chalk shall render these services independently of TPA, and TPA shall not receive any portion of the fees charged (referral or otherwise) by Mr. Chalk for the services rendered. No portion of the financial plan or any other services rendered by TPA to clients should be interpreted as legal advice. Rather, clients should defer to the advice of their own attorney.

Additional Compensation

John Allen Chalk, Jr. does not receive any economic benefit from a non-advisory client for the provision of advisory services. All client advisory service fees are paid directly to Trinity Portfolio Advisors, LLC.

In addition to an annual in-person review of our firm's policies and procedures, each advisor is subject to the following ongoing supervision and review:

- Daily trade reviews
- Quarterly review of personal securities accounts
- Annual review of personal bank statements
- Monthly correspondence reviews, including ongoing capture and review of email
- Periodic reviews of client account activity

Jeffrey Lee McCain

Born: 1966

Investment Advisor Representative

Educational Background and Business Experience

Post-Secondary Education:

- Texas Christian University, BBA, Finance, 1988

Recent Business Experience:

• Trinity Portfolio Advisors, LLC	11/2009 to present	Investment Advisor Representative
• MML Investor Services, Inc.	03/2007 – 11/2009	Financial Advisor

Disciplinary Information

Jeffrey Lee McCain has no reportable disciplinary history.

Other Business Activities

Jeffrey Lee McCain is engaged in investment-related business outside of his role with Trinity Portfolio Advisors, LLC. Mr. McCain, in his individual capacity, is also a licensed insurance agent with various other insurance companies, and in such capacity, may recommend, on a commission basis, the purchase of certain insurance products. Although TPA does not sell such insurance products to its investment advisory clients, TPA does permit its *Advisory Affiliates*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A potential conflict of interest may exist to the extent that Mr. McCain recommends the purchase of insurance products where he receives insurance commissions or other additional compensation from insurance companies.

Jeffrey Lee McCain., is engaged in investment related business outside of his role with Trinity Portfolio Advisors, LLC.

Additional Compensation

Jeffrey Lee McCain does not receive any economic benefit from a non-advisory client for the provision of advisory services. All client advisory service fees are paid directly to Trinity Portfolio Advisors, LLC.

Supervision

Supervisor: John A. Chalk, Jr
Title: Chief Compliance Officer
Phone Number: (817) 416-7227
In addition to an annual in-person review of our firm's policies and procedures, each advisor is subject to the following ongoing supervision and review:

- Daily trade reviews
- Quarterly review of personal securities accounts
- Annual review of personal bank statements
- Monthly correspondence reviews, including ongoing capture and review of email
- Periodic reviews of client account activity

PART 2B OF FORM ADV: BROUCHURE SUPPLEMENT

Annette Christine Hamil
Born: 1979

Investment Advisor Representative

Educational Background and Business Experience

Post-Secondary Education:

- Wichita State University, MBA, MBA, 2003
- Wichita State University, BBA, Accounting, 2001

Recent Business Experience:

Trinity Portfolio Advisors, LLC	11/2010 to present	Investment Advisor Representative
Hamil Truck Sales	12/2013 – present	Administrator

Professional Designations:

Annette Christine Hamil has earned the **Certified Public Accountant (CPA)** designation and is in good standing with the granting authority.

Disciplinary Information

Annette Christine Hamil has no reportable disciplinary history.

Other Business Activities

Annette Christine Hamil is engaged in investment-related business outside of her role with Trinity Portfolio Advisors, LLC (TPA). Mrs. Hamil, in her individual capacity, is also a licensed insurance agent with Mass Mutual Financial Group and various other insurance companies, and in such capacity, may recommend, on a commission basis, the purchase of certain insurance products. Although TPA does not sell such insurance products to its investment advisory clients, TPA does permit its *Advisory Affiliates*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A potential conflict of interest may exist to the extent that Mrs. Hamil recommends the purchase of insurance products where she receives insurance commissions or other additional compensation from insurance companies.

Additional Compensation

Annette Christine Hamil does not receive any economic benefit from a non-advisory client for the provision of advisory services. All client advisory service fees are paid directly to Trinity Portfolio Advisors, LLC.

Supervision

Supervisor: John A. Chalk, Jr
Title: Chief Compliance Officer
Phone Number: (817) 416-7227

In addition to an annual in-person review of our firm's policies and procedures, each advisor is subject to the following ongoing supervision and review:

- Daily trade reviews
- Quarterly review of personal securities accounts
- Annual review of personal bank statements
- Monthly correspondence reviews, including ongoing capture and review of email
- Periodic reviews of client account activity

Max William May

Born: 2000

Investment Advisor Representative

Financial Analyst

Educational Background and Business Experience

Post-Secondary Education:

- Clemson Unversity, BS, Marketing, 2022

Recent Business Experience:

- Trinity Portfolio Advisors, LLC 03/2023 to present Investment Advisor Representative
- Trinity Portfolio Advisors, LLC 07/2022 to present Investment Analyst

Disciplinary Information

Max William May has no reportable disciplinary history.

Other Business Activities

Max William May is engaged in investment-related business outside of his role with Trinity Portfolio Advisors, LLC. Mr. May, in his individual capacity, is also a licensed insurance agent with various other insurance companies, and in such capacity, may recommend, on a commission basis, the purchase of certain insurance products. Although TPA does not sell such insurance products to its investment advisory clients, TPA does permit its *Advisory Affiliates*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A potential conflict of interest may exist to the extent that Mr. May recommends the purchase of insurance products where he receives insurance commissions and other compensation from insurance companies.

Additional Compensation

Max William May does not receive any economic benefit from a non-advisory client for the provision of advisory services. All client advisory service fees are paid directly to Trinity Portfolio Advisors, LLC. Max William May does receive compensation as an employee of Trinity Portfolio Advisors in the role of a financial analyst.

Supervision

Supervisor: John A. Chalk, Jr.
Title: Chief Compliance Officer
Phone Number: (817) 416-7227

In addition to an annual in-person review of our firm's policies and procedures, each advisor is subject to the following ongoing supervision and review:

- Daily trade reviews
- Quarterly review of personal securities accounts
- Annual review of personal bank statements
- Monthly correspondence reviews, including ongoing capture and review of email
- Periodic reviews of client account activity

PART 2B OF FORM ADV: BROUCHURE SUPPLEMENT

Summary of Professional Designations

This Summary of Professional Designations is provided to assist you in evaluating the professional designations and minimum requirements of our investment professionals who hold these designations.

"Understanding Professional Designations" may also be helpful and found on the FINRA website at: https://www.finra.org/investors/professional-designations

Certified Public Accountant (CPA) - licensed and regulated by the Texas State Board of Accountancy. Designation requires meeting minimum education requirements principally in business and accountancy, passing a uniform examination, and performing sufficient hours of public accounting work supervised by a licensee. Maintaining the designation generally requires 120 hours of continuing education in general areas (such as management) and specific technical areas (such as taxation) every three years.

The **Certified Financial Planner (CFP®)** certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year).

- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field.

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct.* The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

A Registered Investment Adviser

121 Countryside Court
Suite 140
Southlake, TX 76092
(817) 416-7227
(817) 336-5736

www.trinityportfolio.com

IARD/CRD Number: 151721
SEC Number: 801-70663

ADV Part 2 Disclosure Brochure

March 1, 2024

This brochure provides information about the qualifications and business practices of Trinity Portfolio Advisors, LLC (hereinafter "TPA"). If you have any questions about the contents of this brochure, please contact Jeri Liedl at (817) 416-7227. 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 Portfolio Advisors, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Trinity Portfolio Advisors, LLC is an SEC registered investment adviser. Registration does not imply any level of skill or training.

Item 2 Summary of Material Changes

Since the filing of our last annual updating amendment dated March 29, 2023, we have the following material change to report:

- Item 4, Item 5, Item 7, Item 12 and Item 15 of the Form ADV Part 2A have been amended to reflect that we may leverage an Order Management System through Pontera to implement tax-efficient asset location and rebalancing strategies on behalf of the client in held away accounts. Please refer to Item 4, Item 5, Item 7, Item 12 and Item 15 of the Form ADV Part 2A for additional information on Pontera.

If you would like another copy of this Brochure, please download it from the SEC Website as indicated above or you may contact Jeri Liedl at 817-416-7227 or jliedl@trinityportfolio.com.

We encourage you to read this document in its entirety.

Item 3 Table of Contents

Item 4 Advisory Business

TPA is a registered investment adviser and provides the following services: financial planning, consulting, investment management services, use of independent mangers and educational seminars/workshops. TPA provides advisory services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and business entities. Prior to engaging TPA to provide any of the foregoing investment advisory services, the client is required to enter into one or more written agreements with TPA setting forth the terms and conditions under which TPA renders its services (collectively the "Agreement"). Neither TPA nor the client may assign the Agreement without the consent of the other party. A transaction that does not result in a change of actual control or management of TPA is not considered an assignment.

TPA has been in business since September 2009. John Chalk, Jr. is the principal owner of TPA as of April 1st, 2019.

As of December 31, 2023, TPA manages $320,417,617 of assets on a discretionary basis and $132,231,499 on a non-discretionary basis.

This disclosure brochure describes the business of TPA. Certain sections will also describe the activities of *Supervised Persons*. *Supervised Persons* are any of TPA's officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on TPA's behalf and is subject to TPA's supervision or control.

Financial Planning and Consulting Services
TPA may provide its clients with a broad range of comprehensive financial planning and consulting services (which may include non-investment related matters).

TPA's financial planning process focuses on helping clients align their wealth with their values. The process begins with getting to know clients personally, professionally and spiritually to allow TPA to understand their personal value systems. From there TPA works with clients to Identify and prioritize financial objectives such as retirement, education funding, risk management, estate planning, succession planning, investment planning, etc. Next, TPA gathers data and begins to analyze their financial position and to compare financial alternatives. Thereafter, TPA develops and presents a plan that seeks to tie together their objectives, values and wealth. Finally, TPA identifies action steps necessary to implement the plan and establish specific dates to monitor, review, and update the plan.

TPA may recommend the services of itself and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if TPA recommends its own services. The client is under no obligation to act upon any of the recommendations made by TPA under a financial planning or consulting engagement or to engage the services of any such recommended professional, including TPA itself. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of TPA's recommendations. Clients are advised that it remains their responsibility to promptly notify TPA if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising TPA's previous recommendations and/or services.

Investment Management Services
Clients can engage TPA to manage all or a portion of their assets on a discretionary basis.

TPA primarily allocates clients' investment management assets among equities, mutual funds and exchange traded funds ("ETFs") in accordance with the investment objectives of the client. TPA also provides advice about any type of investment held in clients' portfolios.

For certain clients, the Registrant may manage client portfolios by allocating portfolio assets among various mutual funds, equities and ETF's on a discretionary basis using one or more of its proprietary investment strategies (collectively referred to as "*investment strategy*"). In so doing, the Registrant shall buy, sell, exchange and/or transfer shares of mutual funds, equities and ETF's based upon the *investment strategy*. The Registrant's management using the *investment strategy* has been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940, as amended. Rule 3a-4 provides similarly-managed accounts, such as the *investment strategy*, with a safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following features have been specifically included in the Registrant's management using the *investment strategy*:

1. **Initial Interview** – an initial interview is conducted with each client to determine the client's financial circumstances, goals, acceptable levels of risk, any reasonable restrictions on the management of their account, and other relevant circumstances;
2. **Individual Treatment** – the client's account is managed on the basis of the client's financial circumstances and investment objectives;
3. **Consultation** – an *Advisory Affiliate* of the Registrant knowledgeable about the client's account shall be reasonably available to consult with the client relative to the status and management of their account;
4. **Notice of Transactions** – the client shall receive notice of all transactions in their account as if they had maintained a similar account outside of the *investment strategy*;
5. **Quarterly Statement** – the client shall be provided with a quarterly statement containing a description of all activity in their account;
6. **Ability to Impose Restrictions** – the client shall have the ability to impose reasonable restrictions on the management of their account, including the ability to instruct the Registrant not to purchase certain securities or types of securities;
7. **No Pooling** – the client's beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the client's account;
8. **Separate Account** – a separate account is maintained for the client with the custodian; and
9. **Ownership** – each client retains ownership of the account (e.g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

In addition to the foregoing, clients may, in writing, place reasonable limitations upon the Registrant's discretionary authority. The *investment strategy* may involve an above-average portfolio turnover that could negatively impact upon the net after-tax gain experienced by an individual client. Securities in the *investment strategy* are usually exchanged and/or transferred without regard to a client's individual tax ramifications. Certain investment opportunities that become available to the Registrant's clients may be limited. For example, various mutual funds or insurance companies may limit the ability of the Registrant to buy, sell, exchange or transfer securities consistent with its *investment strategy*. As further discussed in response to Item 12 (below), in order to meet its fiduciary duties to all of its clients, the Registrant will endeavor to allocate investment opportunities among its clients on a fair and equitable basis. Participation in the Registrant's *investment strategy* carries additional risk to clients in that a mutual fund or insurance company may unilaterally restrict and/or prohibit the Registrant's trading activities thus prohibiting it from managing the assets consistent with the *investment strategy.*

TPA leverages an Order Management System through Ponetra to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. TPA will review the current account allocations. When deemed necessary, TPA will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends.

Where we may leverage an Order Management System through Ponetra, we shall have discretionary authority over the assets in your account subject to reasonable restrictions.

TPA also may render non-discretionary investment management services to clients relative to variable life/annuity products that they may own, their individual employer-sponsored retirement plans, and/or 529 plans or other products that may not be held by the client's primary custodian. In so doing, TPA either directs or recommends the allocation of client assets among the various investment options that are available with the product. Client assets are maintained at the specific insurance company or custodian designated by the product.

On occasion TPA may allocate investment management assets among *Independent Managers* (as defined below).

TPA tailors its advisory services to the individual needs of clients. TPA consults with clients initially and on an ongoing basis to determine risk tolerance, time horizon and other factors that may impact the clients' investment needs. TPA ensures that clients' investments are suitable for their investment needs, goals, objectives and risk tolerance.

Clients are advised to promptly notify TPA if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon TPA's management services.

IRA Rollover Recommendations
Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, TPA is providing the following acknowledgment to to the client. When TPA provides investment advice to the client regarding the client's retirement plan account or individual retirement account, TPA is the fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way TPA makes money creates some conflicts with the client's interests, so TPA operate under a special rule that requires it to act in the client's best interest and not put TPA's interest ahead of the client's. Under this special rule's provisions, TPA must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put TPA's financial interests ahead of the client's when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that TPA gives advice that is in the client's best interest;
- Charge no more than is reasonable for TPA's services; and
- Give the client basic information about conflicts of interest.

TPA benefits financially from the rollover of the clients assets from a retirement account to an account that it manages or provide investment advice, because the assets increase TPA's assets under management and, in turn, TPA's advisory fees. As a fiduciary, TPA only recommends a rollover when it believes it is in the client's best interest.

Use of Independent Managers

As mentioned above, TPA recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain independent investment managers ("*Independent Managers*"), based upon the stated investment objectives of the client. The terms and conditions under which the client engages the *Independent Managers* are set forth in a separate written agreement between TPA or the client and the designated *Independent Managers*. TPA renders services to the client relative to the discretionary selection or recommendation of *Independent Managers.* TPA also monitors and reviews the account performance and the client's investment objectives. TPA receives an annual advisory fee which is based upon a percentage of the market value of the assets being managed by the designated *Independent Managers*.

When recommending or selecting an *Independent Manager* for a client, TPA reviews information about the *Independent Manager* such as its disclosure statement and/or material supplied by the *Independent Manager* or independent third parties for a description of the *Independent Manager*'s investment strategies, past performance and risk results to the extent available. Factors that TPA considers in recommending an *Independent Manager* include the client's stated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research. The investment management fees charged by the designated *Independent Managers*, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, may be exclusive of, and in addition to, TPA's investment advisory fee set forth above. As discussed above, the client may incur additional fees than those charged by TPA, the designated *Independent Managers*, and corresponding broker-dealer and custodian.

The investment management fees charged by the designated Independent Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, will be in addition to, TPA's investment advisory fee set forth above.

In addition to TPA's written disclosure statement, the client also receives the written disclosure statement of the designated *Independent Managers*. Certain *Independent Managers* may impose more restrictive account requirements and varying billing practices than TPA. In such instances, TPA may alter its corresponding account requirements and/or billing practices to accommodate those of the *Independent Managers*.

If TPA refers a client to an *Independent Manager* where TPA's compensation is included in the advisory fee charged by such *Independent Manager* and the client engages the *Independent Manager*, TPA shall be compensated for its services by receipt of a fee to be paid directly by the *Independent Manager* to TPA. Any such fee is paid solely from the *Independent Manager*'s investment management fee and does not result in any additional charge to the client.

Additions and Withdrawals to Accounts

Clients may make additions to and withdrawals from their account at any time, subject to TPA's right to terminate an account. Clients may withdraw account assets on notice to TPA, subject to the usual and customary securities settlement procedures. However, TPA designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives.

Educational Seminars/Workshops

On occasion, TPA may offer educational workshops or seminars regarding personal finance, financial literacy, and other related areas.

Item 5 Fees and Compensation

TPA offers its services on a fee basis, which may include fixed fees, as well as fees based upon assets under management. In addition, certain of TPA's *Supervised Persons* will offer insurance products under a commission arrangement.

Financial Planning and Consulting Fees
TPA charges a fixed fee for financial planning and consulting services. TPA's financial planning and consulting fees are negotiable, but generally range from $1,500 to $250,000 on a fixed fee basis, depending upon the level and scope of the services and the professional rendering the financial planning and/or the consulting services. If the client engages TPA for additional investment advisory services, TPA may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

Prior to engaging TPA to provide financial planning and/or consulting services, the client will generally be required to enter into a written agreement with TPA setting forth the terms and conditions of the engagement and describing the scope of the services to be provided and the portion of the fee that is due from the client prior to TPA commencing services. Generally, TPA requires one-half of the financial planning / consulting fee (estimated fixed) payable upon entering the written agreement. The balance is generally due upon delivery of the financial plan or completion of the agreed upon services. Either party may terminate the agreement by written notice to the other. If termination occurs within five business days of entering into an agreement for such services, the client shall be entitled to a full refund.

Investment Management Fee
TPA provides investment management services for an annual fee based upon a percentage of the market value of the assets being managed by TPA. TPA's annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. TPA does not, however, receive any portion of these commissions, fees, and costs. TPA's annual fee is prorated and charged quarterly, in arrears, based upon either the average daily balance of the assets in the previous quarter or the market value of the assets being managed by TPA on the last day of the previous quarter, as set forth in the client agreement. The annual fee varies (between 0% and 2.00%) depending upon the market value of the assets under management and the type of investment management services to be rendered.

Note: Some of TPA's legacy clients may be billed under a prior fee schedule.

TPA, in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, *pro bono* activities, etc.).

For assets held at a custodian that is not directly accessible by TPA's ("Held Away Accounts"), TPA may, but is not required to, manage these Held Away Accounts using the Order Management System ("Pontera") that allows TPA to view and manage assets. TPA is not affiliated with the platform in any way and receives no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. TPA's annual fee for investment management services for held away accounts utilizes the same Annual Fee Schedule as outlined above. For Held Away Accounts TPA will bill an existing account designated on the executed management agreement.

You will not pay our firm a higher advisory fee other than what is listed above due to the use of Pontera. We pay 0.30% from our advisory fee that we receive from you to Pontera.

Fees Charged by Financial Institutions
As further discussed in response to Item 12 (below), TPA generally recommends that clients utilize the brokerage and clearing services of Fidelity Institutional Wealth Services ("*Fidelity*") for investment management accounts.

TPA may only implement its investment management recommendations after the client has arranged for and furnished TPA with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions include, but are not limited to, *Fidelity*, any other broker-dealer recommended by TPA, broker-dealer directed by the client, trust companies, banks etc. (collectively referred to herein as the "*Financial Institutions*").

Clients may incur certain charges imposed by the *Financial Institutions* and other third parties such as fees charged by *Independent Managers* (as defined below), custodial fees, charges imposed directly by a mutual fund or ETF in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to TPA's fee.

TPA's *Agreement* and the separate agreement with any *Financial Institutions* may authorize TPA or *Independent Managers* to debit the client's account for the amount of TPA's fee and to directly remit that management fee to TPA or the *Independent Managers*. Any *Financial Institutions* recommended by TPA have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to TPA.

Fees for Management During Partial Quarters of Service
For the initial period of investment management services, the fees shall be calculated on a *pro rata* basis.

The *Agreement* between TPA and the client will continue in effect until terminated by either party pursuant to the terms of the *Agreement*. TPA's fees are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate.

Additions may be in cash or securities provided that TPA reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. TPA may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Educational Seminars/Workshops
Educational Seminars/Workshops services specific to speaking arrangements average around $2,000 for the day. This fee will normally include travel expenses.

Prior to engaging TPA to provide Educational Seminars/Workshops services, the client will generally be required to enter into a written agreement with TPA setting forth the terms and conditions of the engagement and describing the scope of the services to be provided and the portion of the fee that is due from the client prior to TPA commencing services. Generally, TPA requires one-half of the fee (estimated fixed) payable upon entering the written agreement. The balance is generally due after completion of the agreed upon services. Either party may terminate the agreement by written notice to the other. In the event the client terminates TPA's services, the balance of TPA's unearned fees (if any) shall be refunded to the client. If termination occurs within five business days of entering into an agreement for such services, the client shall be entitled to a full refund.

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

TPA does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 Types of Clients

TPA provides its services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and business entities.

Minimums Imposed By Independent Managers
In general, TPA requires a minimum of $7500 to open and maintain an advisory account. At our discretion, we may waive this minimum account size. Certain *Independent Managers* may also impose more restrictive account requirements and varying billing practices than TPA. In such instances, TPA may alter its corresponding account requirements and/or billing practices to accommodate those of the *Independent Managers*.

Where TPA may leverage an Order Management System through Pontera, in general, TPA requires a minimum of $7500 to open and maintain an advisory account. At TPA's discretion, TPA may waive this minimum account size.

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

Investment Philosophy
It's about Risk.

Clients should understand and be comfortable with the amount of risk they are taking in a given strategy. Unfortunately, very few investors today truly understand risk. There are a lot of ways to measure risk, standard deviation, alpha, beta, r-squared, but at the end of the day, most individuals do not understand these statistical measures of risk. TPA believes that clients should clearly understand how much money can be lost in a bad market. This downside risk should be expressed as a percentage. TPA believes that the only way to estimate this downside risk is by looking at prior performance. What was the worst perfomance for any 12-month period over various periods of historical performance? The periods of historical performance should include all types of market periods, including bear and bull market periods. The answer to this question is the key to finding comfort with the level of risk clients take with their investments.

Always invest with the probabilities.

Probabilities are about the mathematical estimation of a certain event occurring. Everyone has ways of estimating the probabilities of the direction of the market. Some are very rigid and precise and some are simply an aggregation of several different measures. TPA believes the probability of a direction in the market is as much an art, as a science. When determining probabilities, TPA looks at a lot of different factors. When those factors all point to one direction or another in the market, TPA feels the probability is high that the market is going this way or that. When those factors don't all agree, the probability is lower that someone can determine the direction of the market.

You don't always have to play.

Be patient. TPA believes that it should invest and take risk only when the probabilities appear to be significantly in the clients' favor. TPA does not follow a common belief in the investment community that you should always be invested. It is TPA's position that if the probabilities are not in your favor or are not clear; then you should not invest. The market goes up, down, and sideways. When the probabilities are high enough that the market is going up, then you should invest in a way that may profits you. The same is true when the probabilities are high that the market is going down. When the probabilities are high that the market is going sideways, just don't play.

Start with a STOP.

TPA believes that you should never take a big loss. It is ok to be wrong … just don't be wrong and stubborn. If you are wrong, get out and reassess. TPA feels that too many advisors believe that once they take a position and it turns against them, they have to hold that position until they are right.

This is emotional investing. While the market behaves emotionally, sometimes those that invest emotionally end up crying. TPA is not always right. When wrong, TPA takes steps to minimize losses.

Keep Score.

TPA's methodology includes having clearly defined and measurable goals. TPA believes that you should celebrate when you attain the goal and make adjustments when you don't. Unless you have an objective, you won't know when you have succeeded and when you have failed.

Methods of Analysis
TPA's primary methods of analysis are fundamental, technical and cyclical analysis.

Fundamental analysis involves the fundamental financial condition and competitive position of a company. TPA will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that TPA will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that TPA is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Charting Analysis involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends. The risk is our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Risk of Loss
Mutual Funds, Equities and ETFs

An investment in mutual funds, equities or ETFs involves risk, including the loss of principal. Mutual funds, equities and ETFs are subject to secondary market trading risks. Shares of mutual funds, equities and ETFs will be listed for trading on an exchange, however, there can be no guarantee that an active trading market for such shares will develop or continue. Shares of the mutual fund trade on an exchange at prices at, above or below their most recent net asset valuation (NAV), which is the price per share at which an investor would buy or sell the mutual fund. The NAV per share price of a mutual fund is calculated at the end of each business day and fluctuates with changes in the market value of the holdings of the mutual fund. The share price of a mutual fund may differ significantly from NAV during periods of market volatility, which may, among other factors, lead to the shares of the mutual fund trading at a premium or discount to NAV. Equities trade prices are based on supply and demand. Equities and ETFs experience price changes throughout the day as they are bought and sold. An ETF trades like a stock and does not have its net asset value (NAV) calculated every day like a mutual fund does.

Market Risks

The price of any security or the value of an entire asset class can decline for a variety of reasons outside of TPA's control. Including but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted and unforeseen economic developments, interest rates, regulatory changes and domestic and foreign political, demographic, or social events. If a Client has a high allocation in a particular asset class it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset class in a particular period will cause that Client Account to underperform relative to the overall market.

Advisory Risks

Clients must understand that past performance is not indicative of future results. The profitability of a significant portion of TPA's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks and bonds. There can be no assurance that TPA will be able to predict those price movements accurately. TPA may also make future changes to the advisory services it provides. In addition, it is possible that Clients or TPA itself may experience computer equipment failure, loss of internet access, viruses and other events that my impair access trading platforms. TPA and its representatives are not responsible to any Client for losses unless caused by TPA breaching its fiduciary duty.

Use of Independent Managers

TPA may recommend the use of *Independent Managers* for certain clients. TPA will continue to do ongoing due diligence of such managers, but the such recommendations rely, to a great extent, on the *Independent Managers* ability to successfully implement their investment strategy. In addition, TPA does not have the ability to supervise the *Independent Managers* on a day-to-day basis, if at all.

Management Through Similarly Managed Accounts

For certain clients, TPA may manage portfolios by allocating portfolio assets among various mutual funds, equities and ETFs on a discretionary basis using one or more of its proprietary investment strategies (collectively referred to as "*investment strategy*"). In so doing, TPA buys, sells, exchanges and/or transfers shares of mutual funds, equities and ETFs based upon the *investment strategy*.

TPA's management using the *investment strategy* complies with the requirements of Rule 3a-4 of the Investment Company Act of 1940, as amended. Rule 3a-4 provides similarly managed accounts, such as the *investment strategy*, with a safe harbor from the definition of an investment company.

The *investment strategy* may involve an above-average portfolio turnover that could negatively impact upon the net after-tax gain experienced by an individual client. Securities in the *investment strategy* are usually exchanged and/or transferred without regard to a client's individual tax ramifications. Certain investment opportunities that become available to TPA's clients may be limited. For example, various mutual funds or insurance companies may limit the ability of TPA to buy, sell, exchange or transfer securities consistent with its *investment strategy*. As further discussed in response to Item 12B (below), TPA allocates investment opportunities among its clients on a fair and equitable basis.

Use of Private Collective Investment Vehicles

A Private Collective Investment Vehicle that is available to only accredited investors at the sole discretion of the manager. The manager of these vehicles will have broad discretion in selecting the investments. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous risks in investing in these securities. The client will receive a private placement memorandum and/or other documents explaining such risks.

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss.

Item 9 Disciplinary Information

TPA is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. TPA does not have any required disclosures at this time.

Item 10 Other Financial Industry Activities and Affiliations

TPA is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons. Descriptions of such relationships are listed below.

Insurance Agency Affiliations
Certain of the TPA's *Advisory Affiliates*, in their individual capacities, are also licensed insurance agents with various other insurance companies, and in such capacity, will recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. Although TPA does not sell such insurance products to its investment advisory clients, TPA does permit its *Advisory Affiliates*, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A potential conflict of interest exists to the extent that TPA recommends the purchase of insurance products where TPA's *Advisory Affiliates* receive insurance commissions or other additional compensation from any insurance company. TPA clients are not obligated to purchase insurance products through TPA's *Advisory Affiliates*.

Referrals to Related Certified Public Accountants
TPA does not render accounting advice services to its clients. Rather, to the extent that a client requires accounting services, TPA, if requested, will recommend the services of a certified public accountant, all of which services shall be rendered independent of TPA pursuant to a separate agreement between the client and the certified public accountant. TPA shall not receive any of the fees charged by any recommended Certified Public Accountant, referral or otherwise.

Referrals to Related Attorneys
One of TPA's members, John A. Chalk, Jr. is a licensed practicing attorney admitted to the Bar in the state of Texas. Mr. Chalk maintains a limited legal practice, separate and distinct from TPA's investment advisory activities.

TPA may, from time to time, recommend certain of its clients to Mr. Chalk for various legal services. Mr. Chalk shall render these services independently of TPA, and TPA shall not receive any portion of the fees charged (referral or otherwise) by Mr. Chalk for the services rendered. No portion of the financial plan or any other services rendered by TPA to clients should be interpreted as legal advice. Rather, clients should defer to the advice of their own attorney.

Affiliated Private Collective Investment Vehicles
One of TPA's members, John Chalk, is the manager of Trinity LS Investments, LLC. Trinity LS Investments, LLC relies on the registration of TPA and is the manager to Trinity Life Settlement Fund, LLC. There is no further compensation being taken or accrued by this Fund. It is not open to new investments and or asset purchases. In 2022, all assets in the Fund were sold and it remains open only to receive future distributions, if any.

Fees from Independent Managers
As discussed above, TPA recommends that certain clients authorize the active discretionary management of a portion of their assets by and/or among certain *Independent Managers*. In certain circumstances TPA's compensation is included in the advisory fee charged by such *Independent Managers*. While TPA endeavors at all times to put the interests of its clients first as part of TPA's fiduciary duty, clients should be aware that there may be a conflict of interest to choose such *Independent Managers*.

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

TPA and persons associated with TPA ("Associated Persons") are permitted to buy or sell securities that it also recommends to clients consistent with TPA's policies and procedures.

TPA has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("*Code of Ethics*"). In accordance with Section 204A of the Investment Advisers Act of 1940 (the "Advisers Act"), its *Code of Ethics* contains written policies reasonably designed to prevent the unlawful use of material non-public information by TPA or any of its associated persons. The *Code of Ethics* also requires that certain of TPA's personnel (called "*Access Persons*") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

Unless specifically permitted in TPA's *Code of Ethics*, none of TPA's *Access Persons* may affect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the *Access Person*) any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of TPA's clients.

When TPA is purchasing or considering for purchase any security on behalf of a client, an Access Person may affect a transaction in that security at the same time but not prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when TPA is selling or considering the sale of any security on behalf of a client, an Access Person may affect a transaction in that security at the same time but not prior to the completion of the sale or until a decision has been made not to sell such security. However, Access Person accounts can affect a transaction at the same time during aggregate orders. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients may contact TPA to request a copy of its *Code of Ethics*.

Item 12 Brokerage Practices

As discussed above, in Item 5, TPA generally recommends that clients utilize the brokerage and clearing services of *Fidelity.*

Factors which TPA considers in recommending *Fidelity* or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. *Fidelity* enables TPA to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by *Fidelity* may be higher or lower than those charged by other *Financial Institutions*.

The commissions paid by TPA's clients comply with TPA's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified *Financial Institution* might charge to affect the same transaction where TPA determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a *Financial Institution's* services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. TPA seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Transactions may be cleared through other *Financial Institutions* with whom TPA and the *Financial Institutions* have entered into agreements for prime brokerage clearing services. TPA periodically and systematically reviews its policies and procedures regarding its recommendation of *Financial Institutions* in light of its duty to obtain best execution.

The client may direct TPA in writing to use a particular *Financial Institution* to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that *Financial Institution*, and TPA will not seek better execution services or prices from other *Financial Institutions* or be able to "batch" client transactions for execution through other *Financial Institutions* with orders for other accounts managed by TPA (as described below). As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, TPA may decline a client's request to direct brokerage if, in TPA's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Transactions for each client generally will be affected independently, unless TPA decides to purchase or sell the same securities for several clients at approximately the same time. TPA may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among TPA's client's differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among TPA's clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that TPA determines to aggregate client orders for the purchase or sale of securities, including securities in which TPA's *Supervised Persons* may invest, TPA shall generally do so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. TPA shall not receive any additional compensation or remuneration as a result of the aggregation. In the event that TPA determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) with respect to sale allocations, allocations may be given to accounts low in cash; (v) in cases when a pro rata allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, TPA may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or (vi) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist TPA in its investment decision-making process. Such research generally will be used to service all of TPA's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a potential conflict of interest because TPA does not have to produce or pay for the products or services.

Where TPA may leverage a third party platform through Pontera, TPA does not combine multiple orders for shares of the same securities purchased for advisory accounts that are manage (this practice is commonly referred to as "aggregated trading").

Software and Support Provided by Financial Institutions
TPA may receive from *Fidelity*, without cost to TPA, computer software and related systems support, which allow TPA to better monitor client accounts maintained at *Fidelity*. TPA may receive the software and related support without cost because TPA renders investment management services to clients that maintain assets at *Fidelity*. The software and related systems support may benefit TPA, but not its clients directly.

In fulfilling its duties to its clients, TPA endeavors at all times to put the interests of its clients first. Clients should be aware; however, that TPA's receipt of economic benefits from a broker-dealer creates a potential conflict of interest since these benefits may influence TPA's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Additionally, TPA may receive the following benefits from *Fidelity* through the Fidelity Registered Investment Advisor Group: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Advisor Group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

Item 13 Review of Accounts

For those clients to whom TPA provides investment management services, TPA monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least an annual basis. For those clients to whom TPA provides financial planning and/or consulting services, reviews are conducted on an "as needed" basis. Such reviews are conducted by one of TPA's investment adviser representatives. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with TPA and to keep TPA informed of any changes thereto. TPA shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts.

Item 14 Client Referrals and Other Compensation

If a client is introduced to TPA by either an unaffiliated or an affiliated solicitor, TPA may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)1 of the Advisers Act and any corresponding state securities law requirements. Any such referral fee shall be paid solely from TPA's investment management fee and shall not result in any additional charge to the client. If the client is introduced to TPA by an unaffiliated solicitor, the solicitor shall provide the client with a copy of TPA's written disclosure statement which meets the requirements of Rule 204-1of the Advisers Act and a copy of the solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement including compensation. Any affiliated solicitor of TPA shall disclose the nature of his/her relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of TPA's written disclosure statement at the time of the solicitation.

Item 15 Custody

TPA's *Agreement* and/or the separate agreement with any *Financial Institution* may authorize TPA through such *Financial Institution* to debit the client's account for the amount of TPA's fee and to directly remit that management fee to TPA in accordance with applicable custody rules.

The *Financial Institutions* recommended by TPA have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to TPA.

In TPA's capacity as investment adviser to the Funds, TPA has hired an unaffiliated bank to administer the funds as securities intermediary. The bank will have access to the Fund's funds and securities, and therefore this will exclude TPA or persons associated with TPA from having custody over such funds and securities. TPA provides each investor in the Fund with annual financial statements. If the client is a Fund investor and have questions regarding the financial statements or if the client did not receive a copy, contact TPA directly at the telephone number on the cover page of this brochure.

For assets held at a custodian that is not directly accessible by TPA ("Held Away Accounts") and is managed through Pontera Order Management System, TPA's advisory fees will not be deducted directly from the client's accounts. Please refer to Item 5 Fees and Compensation for detailed information on billing.

Item 16 Investment Discretion

TPA is given the authority to exercise discretion on behalf of clients. TPA is considered to exercise investment discretion over a client's account if it can affect transactions for the client without first having to seek the client's consent. TPA is given this authority through a power-of-attorney included in the agreement between TPA and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). TPA takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The *Independent Managers* to be hired or fired.

Plans Subject to Employee Retirement Income Security Act of 1974 ("ERISA")
In performing Discretionary Fiduciary advisory services for retirement plans, TPA is a fiduciary and an Investment Manager under ERISA. Discretionary Fiduciary Services may include:

1. Discretionary authority to select, monitor, remove and replace the investment alternatives available to participants in participant-directed plans.
2. Discretionary authority to manage the investments of pooled plans, such as defined benefit plans
3. Discretionary authority to design and maintain risk-based portfolios, which are not managed securities but rather asset allocation portfolios utilizing the underlying investment options made available to Plan participants. Models are constructed to provide varying strategic objectives. The allocation of asset classes within each Model Portfolio to achieve each strategy is based on generally accepted investment theories, and Trinity may re-allocate asset classes and re-balance participant accounts.
4. Discretion to select and monitor third party investment managers.

TPA does not provide fiduciary investment advisory services to participants at a participant level, only at the Plan level. However, TPA provides investment education to participants so that participants may choose an allocation strategy or construct a portfolio from the available mutual funds that meets their needs, objectives, time horizon, and risk tolerance.

Fees are subject to negotiation and may be paid from Plan assets or by the Plan sponsor. Fees are billed quarterly, in arrears, and are prorated for each billing period. Annual fees may vary within a range between 0% and 2.00%.

The fees charged by TPA are separate and distinct from any fees which may be charged by mutual funds in which Plan assets are invested. A description of those fees and expenses is available in each fund's prospectus. These fees are also separate from any custodial fees, brokerage fees, and other securities fees. Trinity does not receive any fee with regard to any services it provides to its plan clients other than its stated fee. If it were to receive an additional fee or compensatory item, it would offset that compensation against its stated fees.

Item 17 Voting Client Securities

TPA is required to disclose if it accepts authority to vote client securities. TPA does not vote client securities on behalf of its clients.

Item 18 Financial Information

TPA does not require or solicit the prepayment of more than $1,200 in fees six months or more in advance. In addition, TPA is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. TPA has no disclosures pursuant to this Item.

PRIVACY POLICY NOTICE OF TRINITY PORTFOLIO ADVISORS, LLC

Trinity Portfolio Advisors, LLC has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

WHAT INFORMATION WE DISCLOSE

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

TRINITY PORTFOLIO ADVISORS, LLC RELATIONSHIP SUMMARY

MARCH 2023

Trinity Portfolio Advisors, LLC (TPA) is an SEC registered investment advisor. We offer investment advisory services. Brokerage and investment advisory services and fees differ and it's important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker dealers, investment advisers, and investing.

Is an Investment Advisory Account Right for You?

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

We are an investment adviser and provide advisory accounts and services rather than brokerage accounts and services. This document gives you a summary of the types of services we provide and how you pay. Please ask us for more information.

What investment services and advice can you provide me?

TPA may provide its clients with a broad range of comprehensive financial planning and consulting services. We offer financial advice on a regular basis, by posting market commentary and portfolio changes through various channels of electronic communication. We typically monitor accounts and your investments on an ongoing basis to align with your investment goals.

TPA offers both ***discretionary*** and ***non-discretionary*** accounts. For ***discretionary*** accounts, we may buy and sell investments in your account, without asking you in advance. For ***non-discretionary*** accounts, we give advice, and you decide what investments to buy and sell.

TPA primarily provides advice equities, mutual funds and exchange traded funds ("ETFs") in accordance with the investment objectives of the client. TPA also provides advice about any type of investment held in clients' portfolios.

TPA requires a minimum of $7500 to open and maintain an advisory account. TPA may waive this minimum account size.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 by clicking this https://adviserinfo.sec.gov/firm/brochure/151721.

Conversation Starters: We encourage you to ask your financial professional:

- *Given my financial situation, should I choose an investment advisory service?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

For investment advisory services, we typically charge an ongoing quarterly, *asset-based fee* of a percentage of the value of your assets, which will be reflected in quarterly statements. The more assets you have in this type of account, the more you'll pay in fees, which creates an incentive to encourage you to increase the size of your account. Certain consulting type engagements are a predetermined fixed rate and do not impact the value of any accounts managed by TPA. Some investments impose additional fees that will reduce the value of *retail investors'* initial investments over time for example fee based variable annuities, depending on the company, may charge an annual policy fee. A *retail investor* could be required to pay fees when certain investments are sold (*e.g.*, trading cost imposed by the custodian). Our fees vary, our service does not. Fees can be determined by the overall amount under our firm's management or the type of investment that you agree to participate in. You may pay transaction-based fees when we buy and sell an investment for you (*e.g.*, commissions paid to broker-dealers for buying or selling investments) in addition to the firm's principal fee it charges you for the firm's advisory accounts. You pay our fee (in arrears quarterly) even if you do not buy or sell. You will pay fees and incur costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. *Here is an example to help you understand what this means.* If you open an account and your average daily balance in the account is $100,000 and our fee is 1.6% on an annualized basis, you will pay $1,600 for the year. During the year if you deposit more money, the account average daily balance increases, our fee of 1.6% does not change but because the value of your account is more, so is the fee that is paid to us. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link https://adviserinfo.sec.gov/firm/brochure/151721

Conversation Starter. We encourage you to ask your financial professional:
Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you.

One of TPA's members, John Chalk, is the manager of Trinity LS Investments, LLC. Trinity LS Investments, LLC relies on the registration of TPA and is the manager to Trinity Life Settlement Fund, LLC. There is no further compensation being taken or accrued by this Fund. It is not open to new investments and or asset purchases. In 2022, all assets in the Fund were sold and it remains open only to receive future distributions, if any.

We have a financial incentive to offer or recommend you invest in certain investments because (a) they are issued, sponsored or managed by TPA or our affiliates. Our financial professionals receive additional compensation if you buy these investments.

Conversation Starter. We encourage you to ask your financial professional:
- *How might your conflicts of interest affect me, and how will you address them?*

Refer to our Form ADV Part 2A by clicking this link https://adviserinfo.sec.gov/firm/brochure/151721 to help you understand what conflicts exist.

How do your financial professionals make money?

Our financial professionals are compensated based on the money held in your accounts. The amount is a percentage, as outlined in your management agreement, signed at the time the account is opened or if your account already exists and you enter into an agreement for us to manage that account. If our firm offers an investment product and you are presented with an opportunity to invest money, the advisor will be compensated.

Do you or your financial professionals have legal or disciplinary history?

Trinity Portfolio Advisors, LLC and their financial professional have no legal or disciplinary history to report. Please visit Investor.gov/CRS for a free and simple search tool to research you and your financial professionals.

Conversation starter:
As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

You can find additional information about your investment advisory services and request a copy of the relationship summary at 800-732-0330 or click the link provided https://adviserinfo.sec.gov/firm/brochure/151721.
If you have a problem with your investments, investment account or a financial professional, contact us in writing at 121 Countryside Court, Suite 140, Southlake, Texas 76092.
See our Form ADV brochure on IAPD on Investor.gov and any brochure supplement a financial professional provides. You can also find our ADV brochure on **http://www.trinityportfolio.com/.**