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**FORM ADV PART 2A.  
BROCHURE**

**This brochure provides information about the qualifications and business practices of Trinity Investment Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 610-344-9300. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Trinity Investment Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Trinity Investment Advisors, LLC is 141039.**

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

## Table of Contents

<b><i>Advisory Business</i></b> .....	<b>1</b>
<b><i>Fees and Compensation</i></b> .....	<b>3</b>
<b><i>Performance-Based Fees and Side-By-Side Management</i></b> .....	<b>4</b>
<b><i>Types of Clients</i></b> .....	<b>5</b>
<b><i>Methods of Analysis, Investment Strategies and Risk of Loss</i></b> .....	<b>6</b>
<b><i>Disciplinary Information</i></b> .....	<b>7</b>
<b><i>Other Financial Industry Activities and Affiliations</i></b> .....	<b>8</b>
<b><i>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</i></b> .....	<b>9</b>
<b><i>Brokerage Practices</i></b> .....	<b>10</b>
<b><i>Review of Accounts</i></b> .....	<b>11</b>
<b><i>Client Referrals and Other Compensation</i></b> .....	<b>12</b>
<b><i>Custody</i></b> .....	<b>13</b>
<b><i>Investment Discretion</i></b> .....	<b>14</b>
<b><i>Voting Client Securities</i></b> .....	<b>15</b>
<b><i>Financial Information</i></b> .....	<b>16</b>
<b><i>Requirements for State-Registered Advisers</i></b> .....	<b>17</b>
<b><i>Additional Information</i></b> .....	<b>18</b>

## **Advisory Business**

Form ADV Part 2A, Item 4

Trinity Investment Advisors, LLC's registration was granted by the U.S. Securities and Exchange Commission on June 30, 2006. Michael Kevin McCabe is Member and chief compliance officer of the firm. Mr. McCabe owns one hundred (100%) percent of the equity of the firm. The firm is not publicly owned or traded. There are no indirect owners of the firm or intermediaries who have any ownership interest in the firm. The firm manages each client's portfolio on an individualized basis. Clients may impose restrictions. The firm does not participate in wrap programs. As of December 31, 2012, the firm managed assets on a discretionary basis in the amount of \$96,435,000 which represented 77 accounts and on a nondiscretionary basis in the amount of \$5,800,000. This also represented 27 accounts.

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

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

An asset based fee, payable quarterly in arrears shall be payable by the client. In most cases, such asset advisory fee shall be debited directly from the client's account. The "Qualified Custodian" shall communicate on a monthly basis directly to the client.

Firm shall also, in certain circumstances also refer certain advisory clients to outside portfolio management

firms. Such firms shall charge the client an asset based fee and Firm shall share in a portion of such compensation.

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

All clients are advised that in addition to paying investment advisory fees to Firm firm, a second layer of fees will be payable by the advisory client to the investment adviser of mutual funds.

In addition to paying an advisory fee, clients invested in mutual funds will bear a proportionate amount of the operating expenses of the various funds in which they are invested, including management fees that are paid to the funds' advisers.

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

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

## ***Fees and Compensation***

Form ADV Part 2A, Item 5

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

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

First \$250,000	1.50%
\$250,001-\$500,000	1.25%
\$500,001-\$1,000,000	1.00%
\$1,000,001 +	Negotiable

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

<u>Market Value</u>	<u>Annual Fee</u>
\$1-5,000,000	50 basis points (or 0.50%) per year
\$5,000,001-10,000,000	45 basis points (or 0.45%) per year
\$10,000,001-15,000,000	40 basis points (or 0.40%) per year
\$15,000,001-20,000,000	35 basis points (or 0.35%) per year
\$20,000,001-25,000,000	30 basis points (or 0.30%) per year

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



***Performance-Based Fees and Side-By-Side Management***

Form ADV Part 2A, Item 6

Not applicable.

### ***Types of Clients***

Form ADV Part 2A, Item 7

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



***Methods of Analysis, Investment Strategies and Risk of Loss***

Form ADV Part 2A, Item 8

The type of securities analysis which the firm will use is fundamental analysis. The investment strategy used by Firm will generally be long term purchases which means purchases of more than one year.

***Disciplinary Information***

Form ADV Part 2A, Item 9

Not applicable/None

***Other Financial Industry Activities and Affiliations***

Form ADV Part 2A, Item 10

Applicant offers the eMoney platform to clients.

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

Mr. McCabe also owns Trinity Benefits.

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

Form ADV Part 2A, Item 11

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

## ***Brokerage Practices***

Form ADV Part 2A, Item 12

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

### ***Review of Accounts***

Form ADV Part 2A, Item 13

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

***Client Referrals and Other Compensation***

Form ADV Part 2A, Item 14

None

***Custody***

Form ADV Part 2A, Item 15

Not applicable/none



### ***Investment Discretion***

Form ADV Part 2A, Item 16

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

***Voting Client Securities***

Form ADV Part 2A, Item 17

Firm shall not vote proxy statements for clients.

***Financial Information***

Form ADV Part 2A, Item 18

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

***Requirements for State-Registered Advisers***

Form ADV Part 2A, Item 19

Not applicable

***Additional Information***

None.