



Trinary Capital is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Trinary Capital is *not* a broker-dealer; brokerage and investment advisory services and fees differ and it is important for retail investors to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Trinary Capital offers investment advisory services to its retail investors through a Roboadvisory program, described in [Part 2 of our Form ADV](#). These services are exclusively provided over the internet through our Digital Family Office and Roboadvisory tool, which manages and guides investment portfolios, retirement planning tools, and other financial and investment advice. As a client, you will provide us detailed information about items like your investment goals and expected or desired annual return for your investments via our online interface. Our Roboadvisor software then generates portfolio recommendations to construct and manage your portfolio(s) based on the information you provide.

Monitoring Our Roboadvisory software monitors your account on an ongoing basis. Our online Roboadvisory program was developed and is overseen by our investment advisory personnel.

Investment Authority As a retail investor, you grant Trinary Capital discretionary authority to manage your account through its online Roboadvisory tool. This means that Trinary Capital can buy and sell investments on your behalf when we determine it is appropriate to do so, pursuant to the detailed information you provide us regarding your investment goals. We will also trade in response to your actions (e.g., to withdraw an amount from your account or to deposit additional funds), to re-balance your account, or to otherwise fulfill your stated investment goals. For more detailed information, please see our Form ADV Part 2A, Item 16.

Investment Offering Trinary Capital offers all retail investors a wide range of equity, commodity, alternative, and fixed income investment strategies. Our primary portfolio strategies for the typical retail investor will include a globally diversified stock and bond allocations with a discretionary tactical tilt driven by our proprietary research and judgment, which we generally construct from typically low-cost, liquid, index-tracking exchange-traded funds (“ETFs”). As our client, you are always able to elect a portfolio strategy that best fits your investment goals via the online interface, although certain portfolio strategies are available only to our institutional clients. For more detailed information, please see our Form ADV Part 2A, Item 8.

Account Minimums and Other Requirements Retail investors are required to make a minimum deposit of \$250 USD to open an account with Trinary. For more detailed information, please see our Form ADV Part 2A, Item 5.

Additional Information More detailed information regarding Trinary Capital’s services may be found in our Form ADV, Part 2, which you can access here: [Form ADV Part 2A - Client Brochure](#)
[Form ADV Part 2B – Client Supplement](#)

CONVERSATION STARTERS

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- 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?

Client Assets Under Management	Annual Asset-Based Fee
Less than \$5,000.99	1.55%
\$5,001 - \$10,000.99	1.50%
\$10,001 - \$15,000.99	1.45%
\$15,001 - \$25,000.99	1.40%
\$25,001 - \$50,000.99	1.375%
\$50,001 - \$250,000.99	1.35%
\$250,001 and up	1.15%

What fees will I pay?

The fees charged to retail investors are typically non-negotiable. The fees described in the table to the left are divided into quarterly payments and charged in arrears. All fees paid to us are separate from any other fees that may be associated with the management and administration of your account like custodian/brokerage, sub-advisor, fund fees embedded in the securities purchased on your behalf. Trinary Capital does not receive any portion of such fees.

Because we are paid based on assets under management (“AUM”), Trinary has a financial incentive to recommend you contribute more money to your investment accounts with us. Similarly, if you are eligible for an account subject to different pricing, we have a financial incentive to recommend the higher-priced service offering (although, to date, we currently only offer one class of retail investor account).

You will pay fees and costs **whether you make or lose money on your investments**. Fees and costs will reduce any amount you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more detailed information, please see our [Form ADV Part 2A, Item 5](#).



What are your legal obligations to me when acting 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 advisor, 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. Here are some examples to help you understand what this means:

For example, Trinary may, in the future, have proprietary products, relationships with third-party payors, or revenue-sharing agreements due to its business activities. Similarly, Trinary has an incentive to offer retail investors taxation preparation services through its affiliated accountancy group, The Castorena Group, Inc.—although such services are entirely at the discretion of the client. As another example, Trinary does **not** typically charge performance fees for retail investor accounts, but if it did, Trinary would have an incentive to allocate more profitable investments to performance fee accounts or by devoting more resources towards the management of those accounts.

Further, you are required to use Altruist, Trinary’s affiliated broker-dealer, as the broker-dealer for your online Roboadvisory investment advisory account with Trinary. Other broker-dealers provide different services and have different capabilities.

For more detailed information, please see our [Form ADV Part 2A, Items 5, 10, 11, and 17](#).

CONVERSATION STARTERS

- **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?**
- **How might your conflicts of interest affect me, and how will you address them?**

How do your financial professionals make money?

Trinary’s team is currently compensated through equity in Trinary Capital itself, although Trinary personnel may be paid a base salary and subject to potential discretionary bonuses in the future. Trinary does **not** compensate its team based on the performance of selection of specific securities.

Do your financial professionals have legal or disciplinary history?

No. Trinary Capital personnel, including all members of its investment advisory team, do not have any disciplinary history, nor is the company involved in any legal matters that would have a significant impact on its advisory business. Visit investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

CONVERSATION STARTERS

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

Additional information about our services can be found in our Form ADV Part 2 at: [https://trinarycapital.com/legal-docs/Client_Brochure_\(Part_2A\).pdf](https://trinarycapital.com/legal-docs/Client_Brochure_(Part_2A).pdf)

Answers to the Conversation Starters dispersed throughout this Summary can be found at <https://trinarycapital.com/FAQs>. Retail investors may also contact our investment team at (714) 768-3903 to request up-to-date information and a copy of this (and other) forms.

CONVERSATION STARTERS

- **Who is my primary contact person? Are they a representative of an investment-advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?**