

STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT

IN THE MATTER OF: TRINITY CAPITAL)
MANAGEMENT, LLC) FILE NO. C1200075
ITS OFFICERS, DIRECTORS,)
EMPLOYEES, AGENTS,)
AFFILIATES, SUCCESSORS)
AND ASSIGNS)
AND MARSHALL BRENT ZABKA)
)

ORDER OF CANCELLATION

TO THE RESPONDENT: Trinity Capital Management, LLC (CRD# 127584)
Marshall Brent Zabka (CRD# 4633973)
18302 Chief Road, Suite 103
Charleston, IL 61920

This matter having come on for consideration before Jesse White, Secretary of State, through his designated representative, the Securities Director, and having been fully advised in the premises by the staff of the Illinois Securities Department, Office of the Secretary of State (the "Department"), the Secretary of State herein finds:

1. That Trinity Capital Management, LLC and its Manager, Marshall Brent Zabka, (the "Respondents") are now and at all times relevant hereto were registered as an investment adviser and an investment adviser representative, respectively, in the State of Illinois pursuant to Section 8 of the Illinois Securities Law [815 ILCS 5/1 et seq.] (the "Act").
2. That on or about July 10, 2003 in Form ADV the Respondents stated that they had no clients.
3. That on or about December 8, 2011 in Form ADV the Respondents stated that they had no clients.
4. That on or about January 9, 2011 the Department performed an audit of the Respondents' activities. The Respondents disclosed that there had never been any

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clients and no investment adviser services had ever been provided.

5. That on or about March 5, 2012 the Respondents wrote to the Department that, in an effort to engage in investment adviser business, the Respondents had that very day inquired into the product offerings of Goldman Sachs Asset Management and been directed to that company's public website.
6. That on or about November 2, 2012 the Respondents wrote to the Department that, while the Respondents still had no clients or investment products, the Respondents had identified one person to be a potential client.
7. That Section 8.E(2) of the Act provides, inter alia, that if the Secretary of State finds that any registrant or applicant for registration is no longer in existence or has ceased to do business as an investment adviser or investment adviser representative, or cannot be located after reasonable search, the Secretary of State may by order cancel the registration or application.
8. That the Department has determined Respondent Trinity Capital Management, LLC has ceased to do business as an investment adviser in the State of Illinois.
9. That the Department has determined Respondent Marshall Brent Zabka has ceased to do business as an investment adviser representative in the State of Illinois.
10. That it is in the public interest to enter an order which cancels the registrations of the Respondents in the State of Illinois.

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NOW THEREFORE IT IS HEREBY ORDERED: That the investment adviser registration of Respondent Trinity Capital Management, LLC in the State of Illinois is hereby cancelled. That the investment adviser representative registration of Respondent Marshall Brent Zabka in the State of Illinois is hereby cancelled.

DATED: This 3rd day of December 2012.

A handwritten signature in black ink, appearing to read "Jesse White", with a stylized flourish extending to the right.

JESSE WHITE
Secretary of State
State of Illinois

Shannon Bond
Enforcement Attorney
Illinois Securities Department
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Jefferson Terrace, Suite 300A
Springfield, Illinois 62702