

Form ADV Part 3 – Client Relationship Summary

Dated: March 28, 2025

Item 1: Introduction

Staines Financial, LLC (the “Firm” or “we”) is an investment adviser registered with the Securities and Exchange Commission. We serve as an investment adviser for two privately placed investment vehicles (the “Funds”). In addition, we provide investment management services through a third-party investment adviser (the “Sub-Adviser”). The advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer for retail clients. As retail clients cannot invest in the Funds, we are providing a summary of our services to investors who use the Sub-Adviser we recommend (such investors, the “Sub-Advised Clients”). As an investment adviser, we do not provide brokerage or commission-based services. It is important for you to understand the differences between advisory and brokerage fees and services. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about investment advisers, broker dealers and investing.

Item 2: Relationships and Services

Questions to ask us: 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 investment services and advice can you provide me? Our Firm primarily offers the following investment management services to the Sub-Advised Clients: obtaining and reviewing the information related to a Sub-Advised Client’s investment objectives, risk profile and investment history. Based on this information, we recommend program(s) of the Sub-Adviser for the Sub-Advised Client. Each account will only invest in one program; a Sub-Advised Client that participates in more than one program will have more than one account. We also facilitate the onboarding process for a Sub-Advised Client, including supporting the Sub-Advised Client in completing the new account opening paperwork and determining the appropriateness of the Adviser’s programs. We serve as the ongoing primary relationship contact and will provide ongoing account monitoring services.

We are not granted discretion to buy, sell or otherwise transact in securities and other investments in a Sub-Advised Client’s account. The Sub-Adviser will manage the assets based on the program(s) in which the Sub-Advised Client participates. The Sub-Adviser will have discretion to make investment decisions regarding the allocations in each account. The Sub-Adviser has the ability to recommend mutual funds that it or its affiliates manage. Our Firm does *not* have a minimum account size, but the Sub-Adviser has minimums for its program. Please also see our Form ADV Part 2A (“Brochure”), specifically Items 4 and 7, as well as the Form ADV Parts 2A and 3 of the Sub-Adviser.

Item 3: Fees, Costs, Conflicts and Standard of Conduct

Questions to ask us: 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?

What fees will I pay? Our fees vary depending on the programs of the Sub-Adviser in which you participate. Your fee will be memorialized in the investment management agreement that you sign prior to investing. *You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make overtime on your investments. Please make sure you understand what fees and costs you are paying.*

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The fee that we receive is inclusive of the management fee that a Sub-Advised Client pays to the Sub-Adviser. Typically, the Sub-Adviser will pay us 0.75% of net asset value of an account, which is assessed monthly in arrears. The Sub-Adviser's fee and the fee paid to us is negotiable. The maximum fee of the Sub-Adviser for the programs offered by us is 1.25% per annum.

In addition to this fee, your account is subject to expenses and other fees such as fees of the underlying funds and custodial fees. In addition, you are subject to the indirect expenses of the underlying investments in your account. Please also see our Brochure (specifically Item 5) and the Form ADV Parts 2A and 3 of the Sub-Adviser for additional information about fees and expenses.

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 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. For example, the management fee is "asset based," which means that the fee is calculated as a percentage of the value of the account. Accordingly, the Sub-Advised Clients pay more in fees as the account value increases. Please also see our Brochure (specifically Items 5 and 10) and the Form ADV Parts 2A and 3 of the Sub-Adviser for additional information about fees and conflicts of interest.*

How do your financial professionals make money? Primarily, we profit from the fees charged to our clients, including the Sub-Advised Clients. A portion of these fees are paid to our financial professionals. Please also see our Brochure (specifically Items 5 and 10) and the Form ADV Parts 2A and 3 of the Sub-Adviser for additional information about fees and conflicts of interest.

Item 4: Disciplinary History

Questions to ask us: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Do you or your financial professionals have legal or disciplinary history? No, we do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals. We note that the Sub-Adviser does have a disciplinary event, please refer to the Sub-Adviser's Form ADV Parts 2A and 3 for additional information.

Item 5: Additional Information

Questions to ask us: *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

For additional information on our services, please visit www.StainesFinancial.com. Our Brochure is available at <https://adviserinfo.sec.gov/firm/summary/299405> and any individual brochure supplement that your representative provides. We may be contacted at (916) 663-6723 or by email at service@stainesfinancial.com if you have any questions, need additional information or would like another copy of this Client Relationship Summary.

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Exhibit A – Material Changes to Client Relationship Summary

Since our last CRS from February 2021, we have revised the entire document in whole to reflect the current relationship with the Sub-Adviser. We no longer offer separate accounts, and have deleted all references to these types of accounts. Accordingly, the entire document has been revised and the responses to all Items have changed. If you have reviewed a prior version of our CRS, please review this CRS in whole given the changes made.