

**FORM ADV PART 3**  
**Client Relationship Summary Stirlingshire RIA LLC**  
**October 22, 2025**

**Item 1: Introduction**

Stirlingshire RIA LLC (Stirlingshire or Stirlingshire RIA) is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment 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. Please visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for free, simple tools to research firms and financial professionals, as well as educational materials about broker dealers, investment advisers, and investing. The nature of a client's relationship with a firm depends on which products and account types they choose to invest. Each of these services is different, and the Form CRS is designed to provide information about each option.

**Item 2: Relationships and Services**

What investment services and advice can you provide me? Stirlingshire RIA offers retail investors discretionary advisory services (you allow our financial professional to make the decision regarding which investments to buy or sell in your account without asking you in advance). Our standard discretionary services do not include ongoing periodic monitoring; we review at onboarding and when specific events occur (e.g., trade-surveillance alerts, supervisory escalations, material market/issuer events, or material changes you report as well as trading alerts, supervisory escalations and upon request). You are responsible for keeping your investment goals and related information reported to us current so that we can manage your account appropriately. Stirlingshire RIA does not have a minimum account size and does not limit our investment advice to proprietary products. Our financial professionals may also offer clients investing options based on investment models made available to Stirlingshire on the Advyzo Investment Management (AIM) Model Marketplace. Please also see our Form ADV Part 2A ("[Brochure](#)"), specifically Items 4 (Advisory Business) & 5 (Fees and Compensation). If you choose to open an account with Stirlingshire RIA you must also open a brokerage account with our affiliate, Stirlingshire BD LLC (SBD), and Stirlingshire RIA will have discretion to manage the investments in that brokerage account. SBD is an introducing broker dealer. Transactions placed with SBD are executed, cleared, and settled by, and your assets are custodied with, Apex Clearing Corporation (Apex). Please also see the [Form CRS for SBD](#), and the [Form CRS for Apex](#).

*[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?](#)*

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

What fees will I pay? **All clients will pay a portfolio management fee based on assets under management.** This means that the amount of assets in your account affects our management fee; the more assets you have in your account, the more you will pay us. Therefore, we have an incentive to increase those assets to increase our fee. You pay our advisory fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investment selected. **If Stirlingshire invests your assets in an investment model available in the AIM Model Marketplace, you will also pay a model strategy fee.** Advisory portfolio management fees and model strategy fees are withdrawn directly from the client's accounts monthly in arrears, or, if using AIM Models, are withdrawn quarterly in arrears, with client's written authorization. Please also see Items 4, 5, 6 & 8 of our [Brochure](#). **You will incur additional fees in relation to maintenance and transaction in your SBD brokerage account charged by us or our clearing broker, such as pass-through clearing fees, transfer fees, account maintenance or inactivity or termination fees, transaction fees, margin costs, or other expenses and fees associated with products or services related to your account if applicable when we buy or sell an investment for your account.** Some investments (such as mutual funds and variable annuities) deduct additional ongoing fees and expenses that will reduce the value of your investment over time. Mutual funds, for instance, typically deduct ongoing fees and expenses, such as 12b-1 fees, management fees, or servicing fees, from fund assets. You may also have to pay fees such as surrender charges to sell the product. **You will pay applicable fees and 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. Please make sure you understand what fees and costs you are paying.**

*[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?](#)*

- *As an example, if you give us \$10,000 to invest, and you and your financial adviser have agreed to a 2% fee, you will pay your adviser \$200 annually as a portfolio management fee. If your adviser recommends you invest the entire portfolio using a model marketplace tool, you will pay an additional model marketplace fee to utilize the selected model. The model marketplace fee ranges from 20 basis points to 100 basis points of the assets invested in the model, depending on the*

strategy model selected. Additional fees may be deducted based on the type of investments selected as well as applicable brokerage and clearing fees.

**What are your legal obligations to me when ac.ng 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. Here are some examples to help you understand what this means:

- Many of our financial advisers are also registered representatives. In that role they will receive commissions from the sale of products from your brokerage account, and therefore have an incentive to recommend products that provide them or us additional compensation over those that do not. You can check if your financial professional is dually registered with SBD at [FINRA BrokerCheck](#). Please also see Item 10 of our [Brochure](#) for additional details.
- Your account will be held at our affiliated broker dealer, SBD. SBD receives various brokerage-related compensation related to your account balances and investments. This includes 12b-1 fees, margin debit interest, cash sweep rebates, and stock loan interest, as more fully described in the related brokerage account opening documents and Form CRS for SBD.
- Your adviser may recommend a model market strategy developed on behalf of Stirlingshire. A portion of the applicable model marketplace fees when employing a Stirlingshire strategy will be paid to us. Marketplace fees collected by Stirlingshire in relation to investments in a Stirlingshire model are paid to Stirlingshire's chief market strategist. We may therefore have an incentive to recommend a Stirlingshire strategy over other available strategies.
- For AUM fees, the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets to increase our fee.
- Our financial professionals can invest personally in the same securities that are selected for you and those trades can be made at or about the same time as traded for your account. This gives our financial advisers an incentive to favor their own accounts over yours.

**Questions to ask us: How might your conflicts of interest affect me, and how will you address them? How do your financial professionals make money?** Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Stirlingshire mitigates these potential conflicts of interest by implementing policies and procedures designed to examine its relationship with SBD and Apex at least annually to determine if these providers remain appropriate to service our client accounts, and by disclosing these conflicts to you.

#### **Item 4: Disciplinary History**

**Do you or your financial professionals have legal or disciplinary history?** Yes, we have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

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

#### **Item 5: Additional Information:**

**For additional information on our advisory services, see our Brochure available at**

**<https://adviserinfo.sec.gov/firm/summary/327779> and any individual brochure supplement your representative provides. For additional information about our affiliated brokerage services, see the [Form CRS for SBD](#). If you have any questions, need additional information, or want another copy of this Client Relationship Summary, contact us at 877- 600-7026.**

**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?**