Item 1. Cover Page

Pacific Income Advisers, Inc.
Client Brochure
March 27, 2025

2321 Rosecrans Avenue, Suite 1260
El Segundo, CA 90245
Phone: (310) 393-1424
Fax: (310) 434-0100

www.pacificincome.com

This brochure provides information about the qualifications and business practices of Pacific Income Advisers, Inc. ("PIA"). If you have any questions about the contents of this brochure, please contact us at (310) 393-1424, or by email at info@pacificincome.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

Pacific Income Advisers is a registered investment adviser. Registration with the SEC as an investment adviser does not imply that PIA or any of its principals possess a particular level of skill or training.

Additional information about Pacific Income Advisers, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Material Changes

Annual Update

Pacific Income Advisers, Inc. (“PIA”) is providing this information as part of our annual update, which contains material changes from our last annual update. This section discusses only material changes since the last annual update, which most recently occurred on March 26, 2024.

Material Changes Since the Last Update

There are no material updates since the last annual update on March 26, 2024.

Full Brochure Availability

If you would like to receive a free copy of PIA's Firm Brochure, please call 310-393-1424, visit our website, www.pacificincome.com, or email us at info@pacificincome.com. You may also view a copy of PIA's Firm Brochure through the Investment Adviser Public Disclosure (IAPD) system at www.adviserinfo.sec.gov.

Item 3. Table of Contents

Item 4. Advisory Business

Firm Description

Pacific Income Advisers, Inc. (“PIA”), a Delaware Corporation, is federally registered as an investment adviser with the Securities and Exchange Commission (“SEC”) and has been in business since 1986.

PIA is an independent, employee-owned investment advisory firm offering both fixed income and equity strategies, with a primary focus on fixed income. For more information on the types of clients we serve, please see the Types of Clients section of this brochure.

Principal Owners

Lloyd McAdams, President, Director and Portfolio Manager, through the Lloyd McAdams Family Trust, and Heather U. Baines, Chairman, through the Heather U. Baines Family Trust, are the principal owners of PIA. Austin Rutledge, Joseph E. McAdams, Adilberto Torres and Timothy Tarpening individually own minority interests in PIA.

Types of Advisory Services

PIA offers fixed income and equity strategies to those clients described in the Types of Clients section, through four distinct platforms consisting of institutional separately managed accounts (Institutional SMA), retail separately managed wrap-fee program accounts (Retail Wrap-Fee Programs), mutual funds, and model delivery programs.

For more information on each of these investment strategies, please see the *Methods of Analysis, Investment Strategies and Risk of Loss* section of this brochure.

Institutional SMA

PIA invests in the following portfolio styles for its Institutional SMA clientele:

Equities

- Small Cap – Core;
- Small Cap – Growth;

Fixed Income

- Core Plus;
- Corporate;
- High Yield;

- Intermediate Core Plus;
- Limited Duration;
- Market Duration;
- Moderate Duration;
- Short-Term;
- Ultra Short-Term;
- Shares in the PIA BBB Bond Fund, Managed Account Completion Shares (“MACS”), PIA High Yield (MACS) Fund and/or the PIA MBS Bond Fund, MACS;
- Shares in the PIA Short-Term Securities Fund and/or the PIA High Yield Fund, Institutional Class (see “PIA Mutual Funds” below).

<u>Retail Wrap-Fee Programs</u>
PIA currently participates in approximately 30 Retail Wrap-Fee Programs as a sub-adviser or under a dual contract arrangement. PIA does not sponsor any wrap-fee program.

PIA offers the following managed account portfolio styles:

- Core Plus MACS;
- Corporate MACS;
- Intermediate Core Plus MACS;
- Limited Duration ETF-MACS;
- Limited Duration MACS;
- Limited Duration SMA;
- Limited Duration SMA Enhanced;
- Market Duration ETF-MACS;
- Market Duration MACS;
- Market Duration SMA;
- Market Duration SMA Enhanced;
- Moderate Duration ETF-MACS;
- Moderate Duration MACS;
- Small Cap Core;
- Small Cap Growth;
- Shares in the PIA BBB Bond Fund, MACS, PIA High Yield (MACS) Fund and/or the PIA MBS Bond Fund, MACS; and
- Shares in the PIA Short-Term Securities Fund and/or the PIA High Yield Fund, Institutional Class (see “PIA Mutual Funds” below).

<u>PIA Mutual Funds</u>
PIA serves as sub-adviser to the PIA Mutual Funds, a family of open-end registered mutual funds. PIA offers five funds:

- PIA BBB Bond Fund, MACS;
- PIA High Yield Fund, Institutional Class;
- PIA High Yield (MACS) Fund;
- PIA MBS Bond Fund, MACS; and
- PIA Short-Term Securities Fund.

PIA Model Delivery Program

PIA provides model portfolios to unaffiliated investment advisers ("Sponsors") who may utilize such model portfolios in connection with the management of their client accounts. Model portfolios may relate to the same investment strategies that are also offered to PIA's discretionary accounts. As a model portfolio provider, PIA designs, monitors and updates the model portfolio but has no responsibility for implementing its recommendations or placing trades on behalf of participating accounts. PIA does not enter into a direct advisory relationship with the clients of these Sponsors and the model portfolios are not tailored to the specific needs or circumstances of the Sponsor's clients. The Sponsors are solely responsible for initiating all trading and rebalancing activity recommended by the model portfolio(s). Depending on the structure of the Sponsor's program, Sponsors may choose not to implement certain changes made to our model portfolio or may delay the timing of trading in response to changes made to our model. As a result, the investment performance of a particular Sponsor's client may differ from the investment performance of PIA's Client Accounts that have elected to follow a similar investment strategy.

PIA provides the model portfolios to the Sponsors at an agreed upon, periodic basis which varies depending upon the particular terms of the agreement between PIA and the Sponsor. Changes to the model portfolio will not be communicated to model program Sponsors until completion of aggregated trading for PIA's discretionary clients. As a result, it is possible that, depending on the particular circumstances surrounding an order, PIA's discretionary clients may receive prices that are more favorable than those received by a client of a program Sponsor or vice versa. In addition, Client Accounts following the PIA model portfolio may be positively or negatively impacted if companies included in the model portfolio(s) release important or material information prior to the time trading orders for a particular security have been completed by the Sponsor. Please refer to Item 12 for more information regarding the communication and delivery of a model portfolio to program Sponsors. For more information on each of these investment strategies, please see the *Methods of Analysis, Investment Strategies and Risk of Loss* section of this brochure.

Tailored Relationships

Although most client relationships are discretionary and accounts are managed in accordance with the methods and investment strategies as explained in the *Methods of Analysis, Investment Strategies and Risk of Loss* section of this brochure, clients may still impose investment limitations and restrictions on certain securities or types of securities. Such restrictions must be submitted to PIA in writing, if not already addressed in the investment management agreement. Where PIA delivers its model portfolios to unaffiliated investment advisers, these portfolios are not tailored to the specific needs or circumstances of those advisers' clients.

Investment Management Agreement

Institutional SMA

All clients desiring to open an Institutional Separately Managed Account with PIA must enter into PIA's investment management agreement and provide an investment policy statement. PIA relies upon the contents of the client's completed investment policy statement when evaluating the most suitable types of investment products for the client.

Retail Wrap-Fee Programs

Under Retail Wrap-Fee Programs, advisory clients pay a specified fee for investment advisory services and the execution of transactions. Advisory services include portfolio management and/or advice concerning selection of other advisers; and the fee is not based directly upon transactions in the client's account. PIA receives a portion of the wrap fee for services rendered.

Retail Wrap-Fee Programs are managed similarly to Institutional SMAs with the following exceptions:

- Corporate bond position sizes are normally 3% per issuer for Retail Wrap-Fee Programs and 0.5-1.5% for Institutional SMA.
- The bonds in the Retail Wrap-Fee Program are typically more liquid.

Although the ultimate responsibility of analyzing suitability of investments rests solely with the program sponsor, PIA requests from the program sponsor detailed client information, including client profiles, account restrictions and other material documents in order to review the investment portfolio(s), guidelines and restrictions (where applicable) selected by the client prior to investment.

Mutual Funds
Investors wishing to invest in any of PIA's mutual funds have the option of completing a new account form, or entering into a PIA Investment Management Agreement ("IMA") and submitting an Investment Policy Statement ("IPS"), which allows for the purchase of the fund.

Assets Under Management

As of December 31, 2024, PIA managed $2,107,440,000 in regulatory assets under management, all on a discretionary basis.

Item 5. Fees and Compensation

Description and Billing

When calculating the value of client investments for reporting or fee calculation purposes, PIA utilizes recognized and independent pricing services to the fullest extent possible. Whenever valuation information for specific, illiquid, foreign, private, or other investments is not available through pricing services, PIA will obtain and document price information from at least two independent sources, such as broker-dealers, banks, pricing services or other sources, where practicable and appropriate. The client has the ability to determine the method for computing fair market value used in the fee calculation. Most commonly, management fees are calculated by applying the advisory fee percentage to the market value of the account at the end of each quarter. When calculating the value of client investments for reporting or fee calculation purposes, by default, PIA includes accrued interest on fixed income securities under management. Another common practice is to use the average of three month-end values on a quarterly basis. In rare situations, PIA takes significant cash flows into account when computing the average. The method utilized will be noted within the client's investment management agreement.

Institutional SMA
For all Separately Managed Accounts, PIA charges an annual advisory fee that is calculated and paid

quarterly in accordance with the following fee tables:

Annual Fee Based on Total Value of Eligible Client Assets under Management with PIA*

Portfolio Style	1st 50MM	Next $50MM	Thereafter	
High Yield	.50%	.45%	.40%	
Portfolio Style	**1st 25MM**	**Next $25MM**	**Thereafter**	
Core Plus	.35%	.30%	.25%	
Intermediate Core Plus	.35%	.30%	.25%	
Portfolio Style	**1st 10MM**	**Next $40MM**	**Thereafter**	
Corporate	.40%	.30%	.25%	
Limited Duration	.35%	.30%	.25%	
Market Duration	.35%	.30%	.25%	
Moderate Duration	.35%	.30%	.25%	
Portfolio Style	**1st 10MM**	**Next $40MM**	**Next $50MM**	**Thereafter**
Short-Term	.25%	.20%	.175%	.15%
Ultra Short-Term	.25%	.20%	.175%	.15%
Portfolio Style	**1st 10MM**	**Next $40MM**	**Thereafter**	
Small Cap	1.0%	.80%	.70%	

*Fees are negotiable.

Retail Wrap-Fee Programs

PIA's fee for its wrap-fee arrangements is determined by separate contracts entered into with various program sponsors. These fees, including any and all trading and transaction costs, are "wrapped" into one overall fee as determined and calculated by the wrap-fee sponsor. Annual wrap-fees for PIA clients, charged by the program sponsor, generally vary between 1.00% and 1.50% of the assets under management.

The amount of PIA's portion of the wrap fee varies dependent upon several factors, including: (1) the specific terms agreed on between PIA and the wrap-fee sponsor, (2) the client's account size, (3) the client's related investment management accounts, (4) individual account investment restrictions, (5) and whether any assets are invested in one of PIA's Mutual Funds.

Important information about the program sponsor's advisory programs, brokerage services, custody relationships, and conflicts of interest is available in the Program Sponsor's Form ADV Part 2. To obtain a copy, please contact the Program Sponsor directly.

Mutual Funds

PIA charges management fees for acting as investment manager for PIA's non-MACS Mutual Funds. Such fees are calculated depending on the portfolio style, and paid monthly in arrears.

- PIA Short-Term Securities Fund — 0.20% of assets under management
- PIA High Yield Fund, Institutional Class — 0.55% of assets under management
- PIA BBB Bond Fund, MACS — Fee charged through Program Sponsor *
- PIA High Yield (MACS) Fund — Fee charged through Program Sponsor *
- PIA MBS Bond Fund, MACS — Fee charged through Program Sponsor *

* PIA clients and the clients of PIA's Plan Sponsors may permit their account(s) to invest in the BBB Bond Fund, the MBS Bond Fund, and the PIA High Yield (MACS) Fund. Therefore, in order to avoid charging clients two advisory fees on managed assets which may be invested in these funds, the MACS mutual funds do not charge any management fees directly inside these funds.

PIA may recommend investment in the PIA Funds to any of its clients. Such a recommendation could create a conflict of interest between PIA and the client. PIA will only recommend an investment in Fund shares for client portfolios if it represents a suitable investment based on that client's investment objectives. PIA receives an account-level investment management fee from its clients (as stated in clients' investment management agreement), calculated as a percentage of client assets, which includes assets invested in the Funds. Clients that invest directly in a PIA MACS Fund, as part of a PIA strategy with an account-level management fee, will pay fees associated with the Funds' operations, but do not pay additional investment management fees inside the respective PIA MACS mutual fund to PIA on those assets invested in the Fund. For clients (including ERISA plans) that invest directly in a PIA Non-MACS Fund as part of a PIA strategy with an account-level management fee, PIA will rebate back the PIA Non-MACS Fund's management fee (as disclosed in the Fund's prospectus) for the portion of assets invested in the fund. In addition, for clients with a signed Investment Management Agreement ("IMA") that invest primarily or solely in a PIA MACS Fund, the client will pay an account level fee as described in the IMA. This account level fee is comprised of the fund's operating expenses and a management fee, which is the difference between the stated account level fee and the fund's operating expenses.

Fee Billing

Investment advisory fees are generally billed quarterly in arrears unless PIA and the client agree that they will be billed in advance. Clients are either invoiced directly, or the client's custodian deducts fees from the client's account at the end of each calendar quarter, in accordance with the written direction and approval of clients or previous instruction. For accounts opened or closed after the beginning of a new calendar quarter, fees will be prorated for the number of days in the quarter the account was under management. Any earned, unpaid fees will be due and payable at the time the account is closed. PIA reserves the right to pro-rate the quarterly fee based on intra-period contributions and withdrawals. In cases where PIA has agreed to bill its advisory fees quarterly in advance and either party terminates the provision of investment advisory services before the end of a calendar quarter, fees will be reimbursed to the client on a pro-rata basis for the number of days in the quarter the account was not under management.

<u>Institutional SMA</u>
Clients are either invoiced directly, or the client's custodian automatically deducts fees from the client's account at the end of each calendar quarter, in accordance with the written direction and approval of clients.

<u>Retail Wrap-Fee Programs</u>
The program sponsor automatically deducts fees from the client's account at the beginning or end of each calendar quarter, in accordance with the written direction and approval of clients.

Wrap-fee clients are required to pay the program sponsor a quarterly advisory fee based on the sponsor's advisory fee and PIA's negotiated management fee.

Most Favored Nation (" MFN") Clauses

We generally do not enter into advisory agreements with most favored nation ("MFN") clauses. However, certain wrap-fee sponsors have negotiated such clauses in their advisory agreements. These clauses require us to decrease management fees charged to the MFN client if PIA enters into an advisory agreement at a lower effective fee rate with another client based on certain criteria. The applicability of an MFN clause may depend upon various factors as detailed in the advisory agreement.

Other Fees

In connection with PIA's advisory services, clients may incur and are responsible for the fees and expenses charged by their custodians and imposed by broker-dealers. Such fees may include, but are not limited to, custodial fees, transaction costs, fees for duplicate statements and transaction confirmations, brokerage commissions, mutual fund expenses and fees for electronic data feeds and reports. See the *Brokerage Practices* section for more information.

Institutional SMA advisory fees are negotiable. For friends and family of PIA, such advisory fees may be waived or reduced.

PIA and its supervised persons do not receive compensation for the sale of securities or other investment products, including asset-based sales charges, or distribution or service fees from the sale of mutual funds.

Item 6. Performance-Based Fees

If PIA engages in alternative fee arrangements, such as those based on performance (including unrealized gains), PIA calculates the fee in accordance with the requirements of the Investment Advisers Act of 1940. Such performance fee arrangements are only made with "Qualified Clients" as defined under Rule 205-3, who reside in jurisdictions where performance fees are permitted. Performance fee arrangements create an inherent conflict of interest, as they may create incentives for PIA to make investments that are riskier or more speculative than the firm would otherwise make in the absence of a performance fee. In order to address any potential conflicts of interest, no Portfolio Manager's compensation is tied to any client's performance-based fees.

Item 7. Types of Clients

Description

PIA currently provides advisory services to individuals, trusts, estates, investment companies, pension and profit sharing plans, charitable organizations, state or municipal government entities, insurance companies, corporations and business entities, and unions.

Account Minimums

PIA typically recommends institutional accounts open at no less than $1 Million. Furthermore, those clients who wish to open separately managed fixed income portfolio accounts should be aware that frequent requests to liquidate all, or a portion, of their accounts to a size of $10 Million or less will most likely result in "odd lot" bond transactions. Odd lot bond transactions can usually only be executed at levels that are less favorable than "round lot" bond transactions ($1+ million par value). Therefore, potential clients are discouraged from entering into any separate account investment advisory arrangement with PIA if there is any material likelihood of frequent significant bond portfolio liquidations.

For wrap-fee accounts, PIA and the program sponsor generally recommend accounts opening at not less than $70,000. However, no minimum annual fee is assessed.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

The foundation of PIA's fixed income investment process is the firm's Yield Curve and Sector Analysis. PIA's yield curve analysis is centered on a fundamental belief that there is an equilibrium shape for the various yield curves, which is a function of several factors, including economic cycles, financial market volatility, and the supply factors across each part of the yield curve. Market forces tend to distort these yield curves away from their equilibrium shape. Each yield curve sector is evaluated based on its relationship to that equilibrium shape, and to the risks embedded in each yield curve. PIA ranks sectors in terms of their valuations on a risk-adjusted basis. PIA also utilizes other quantitative resources designed to gain probabilistic insight into factors affecting sector valuations. PIA utilizes internal quantitative MBS research and qualitative credit research that produces top-down and bottom-up security analysis. The Investment Strategy Group utilizes these inputs as part of their decision-making process. The Investment Strategy Group is responsible for all macro investment decisions for PIA's fixed income strategies; i.e., sector selection, duration, curve positioning and average credit quality. The Investment Strategy Group is comprised of several senior employees of the firm, including the Head of the Bond Department.

For its sub-advised equity portfolios, PIA believes positive earnings estimates lead to increases in stock prices over time. When positive changes emerge at a company, analysts tend to react by raising their earnings estimates. We believe the key to generating alpha is to identify those earnings revisions that are secular rather than one-time events. In-depth fundamental analysis is employed to understand how revisions in earnings estimates drive equity price movements.

Investment Strategies

PIA offers many taxable, domestic investment grade strategies, as well as core plus fixed income, high yield, and small cap equity strategies.

PIA provides these investment alternatives to both institutional and retail investors via separate accounts and mutual funds. PIA manages the SMA strategies through the means of a composite, which is defined as aggregation of individual portfolios representing a similar investment mandate, objective or strategy. PIA also offers model delivery programs which employ its strategies.

Risk of Loss

Although PIA makes every effort to preserve each client's capital and achieve real growth of wealth, investing in securities involves risk of loss that each client should be prepared to bear.

Investors in PIA's products may lose money. Success cannot be guaranteed. Risks associated with investments in the types of securities in which PIA invests include:

Active Management Risk
PIA accounts are subject to active management risk because portfolios are actively managed. PIA's management practices and investment strategies might not produce the desired results.

Adjustable Rate and Floating Rate Securities Risks
Although adjustable and floating rate debt securities tend to be less volatile than fixed-rate debt securities, they nevertheless fluctuate in value. A sudden and extreme increase in prevailing interest rates may cause adjustable and fixed-rate debt securities to decline in value because:

- There may be a time lag between the increases in market rates and an increase in the interest paid on the adjustable or floating rate security;

- There may be limitations on the permitted increases in the interest paid on the adjustable or floating rate security so that the interest paid does not keep pace with increases in market interest rates;

- The duration of adjustable rate securities which are mortgage-backed securities may increase because of slowing of prepayments causing investors to consider these securities to be longer term securities; or

- Securities may decline in credit quality.

Asset-Backed Securities Risk
These risks include Market and Regulatory Risk, Interest Rate Risk, Credit Risk, Prepayment Risk and Extension Risk. Asset-backed securities may decline in value when defaults on the underlying assets occur and may exhibit additional volatility, face valuation difficulties and/or become illiquid in periods of changing interest rates, difficult or frozen credit markets, or deteriorating economic conditions. When interest rates decline, the prepayment of assets underlying such securities may require PIA to reinvest that money at lower prevailing interest rates, resulting in reduced returns.

Collateralized Mortgage Obligation (CMO) Risk
A CMO is a hybrid between a mortgage-backed bond and a mortgage pass-through security. Similar to a mortgage-backed security, interest and prepaid principal on CMOs is paid, in most cases, monthly. CMOs may be collateralized by whole mortgage loans but are more typically collateralized by portfolios

of mortgage pass-through securities guaranteed by GNMA, FHLMC or FNMA, and their income streams. CMOs may offer a higher yield than U.S. government securities, but they may also be subject to greater price fluctuation and credit risk, as well as liquidity risk.

Convertible Securities Risk

A convertible security is a security that can be converted into another security. Convertible securities may be convertible bonds or preferred stocks that pay regular interest and can be converted into shares of common stock (sometimes conditioned on the stock price appreciating to a predetermined level). Convertible securities are subject to the risks of both debt securities and equity securities. The values of convertible securities tend to decline as interest rates rise and, due to the conversion feature, tend to vary with fluctuations in the market value of the underlying common or preferred stock.

Counterparty Risk

PIA transactions involving a counterparty are subject to the risk that the counterparty or a third party will not fulfill its obligation to PIA. Counterparty risk may arise because of the counterparty's financial condition (i.e., financial difficulties, bankruptcy, or insolvency), market activities and developments, or other reasons, whether foreseen or not. A counterparty's inability to fulfill its obligation may result in significant financial loss to the client.

Credit Risk

Issuers of the bonds and other debt securities held in PIA portfolios may not be able to make interest or principal payments. Even if these issuers are able to make interest or principal payments, they may suffer adverse changes in financial condition that would lower the credit quality of the security, leading to greater volatility in the price of the security.

Currency Risk

PIA is subject to the risk that foreign currencies will decline in value relative to the U.S. Dollar, or, in the case of hedging positions, that the U.S. Dollar will decline in value relative to the currency being hedged.

Derivatives Risk

PIA may invest in derivative securities for both bona fide hedging purposes and for speculative purposes. A derivative security is a financial contract whose value is based on (or "derived from") a traditional security (such as a bond) or a market index. Derivatives involve the risk of improper valuation, the risk of ambiguous documentation and the risk that changes in the value of the derivative may not correlate closely with the underlying security. Losses from a derivative instrument may be greater than the amount invested in the derivative instrument. Certain derivatives have the potential for unlimited losses, regardless of the size of the initial investment.

Dollar Roll Risk

In a mortgage dollar roll, an account sells mortgage-backed securities for delivery in the current month and simultaneously contracts to repurchase substantially similar (same type, coupon and maturity) securities on a specified future date. Dollar rolls involve the risk that PIA's counterparty will be unable to deliver the mortgage-backed securities underlying the dollar roll at the fixed time. If the buyer files for bankruptcy or becomes insolvent, the buyer or its representative may ask for and receive an extension of time to decide whether to enforce PIA's repurchase obligation. In addition, PIA earns interest by investing the transaction proceeds during the roll period. Dollar roll transactions may have the effect of creating leverage in PIA's portfolios.

ETF and Mutual Fund Risk
When PIA invests in an ETF or mutual fund, it will bear additional expenses based on its pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities that the ETF or mutual fund holds. Clients also will incur brokerage costs when PIA purchases ETFs in a client portfolio.

Extension Risk
An issuer may pay principal on an obligation held by the Fund (such as an asset-backed or mortgage-backed security) later than expected. This may happen during a period of rising interest rates. Under these circumstances, the value of the obligation will decrease.

Foreign Securities and Emerging Markets Risk
The value of PIA's foreign investments may be adversely affected by changes in the foreign country's exchange rates, political and social instability, changes in economic or taxation policies, decreased liquidity and increased volatility. Foreign companies may be subject to less regulation than U.S. companies. Events and evolving conditions in certain economies or markets may alter the risks associated with investments tied to countries or regions that historically were perceived as comparatively stable becoming riskier and more volatile. These risks are magnified in countries in "emerging markets." Investment in emerging markets involves additional risks, including less social, political and economic stability, smaller securities markets and lower trading volume, restrictive national policies and less-developed legal structures.

General Market Risk
Economies and financial markets throughout the world are becoming increasingly interconnected, which increases the likelihood that events or conditions in one country or region will adversely impact markets or issuers in other countries or regions. Securities in the Fund's portfolio may underperform in comparison to securities in general financial markets, a particular financial market or other asset classes, due to a number of factors, including inflation (or expectations for inflation), interest rates, global demand for particular products or resources, natural disasters or events, terrorism, regulatory events and government controls.

Government-Sponsored Entities Risk
PIA invests in securities issued or guaranteed by government-sponsored entities, including GNMA, FNMA and FHLMC. However, these securities may not be guaranteed or insured by the U.S. Government and may only be supported by the credit of the issuing agency.

High Yield Securities Risk
Securities with ratings lower than BBB- or Baa3 by a Nationally Recognized Statistical Rating Organization ("NRSRO") are known as "high yield" securities. High yield securities provide greater income and opportunity for gains than higher-rated securities but entail greater risk of loss of principal.

Interest Rate Risk
In general, the value of bonds and other debt securities falls when interest rates rise. Longer-term obligations are usually more sensitive to interest rate changes than shorter term obligations.

Leverage Risk

The use of leverage can enhance investment returns. Leverage, however, also increases risks. The use of leverage increases the risk of loss resulting from various factors, including rising interest rates, increased interest rate volatility, downturns in the economy and reductions in the availability of financing or deterioration in the conditions of any of the portfolio investment assets.

Liquidity Risk

Reduced liquidity in the bond markets can result from a number of events, such as limited trading activity, reductions in bond inventory, and rapid or unexpected changes in interest rates. Low or lack of trading volume may make it difficult to sell securities held in PIA portfolios at quoted market prices. Additionally, PIA may inherit small, odd lot securities in retail brokerage platforms, which may result in material price differences from quoted round lot prices due to the small size of the inherited securities.

Loan Participation and Assignment Risk

Loan participations and assignments involve special types of risk, including credit risk, interest rate risk, liquidity risk, and the risks of being a lender. Bank loans (i.e., loan participations and assignments), like other high yield corporate debt obligations, have a higher risk of default and may be less liquid and/or become illiquid.

Market Risk

The prices of the securities in which PIA invests may decline for a number of reasons, including in response to economic developments and perceptions about the creditworthiness of individual issuers.

Market and Regulatory Risk

Events in the financial markets and economy may cause volatility and uncertainty and adversely impact a portfolio's performance. These events have included, but are not limited to: corporate bankruptcies or restructurings, and other events related to the sub-prime mortgage crisis; governmental efforts to limit short selling and high frequency trading; measures to address U.S. federal and state budget deficits; social, political, and economic instability in Europe; economic stimulus by the Japanese central bank; steep declines in oil prices; dramatic changes in currency exchange rates; pandemics, epidemics and other similar circumstances in one or more countries or regions; and China's economic slowdown. Interconnected global economies and financial markets increase the possibility that conditions in one country or region might adversely impact issuers in a different country or region. Traditionally liquid investments may experience periods of diminished liquidity. Governmental and regulatory actions, including tax law changes, may also impair portfolio management and have unexpected or adverse consequences on particular markets, strategies, or investments. The Fund's investments may decline in value due to factors affecting individual issuers (such as the results of supply and demand), or sectors within the securities markets. The value of a security or other investment also may go up or down due to general market conditions that are not specifically related to a particular issuer, such as real or perceived adverse economic conditions, changes in interest rates or exchange rates, or adverse investor sentiment generally. In addition, unexpected events and their aftermaths, such as the spread of deadly diseases; natural, environmental or man-made disasters; financial, political or social disruptions; terrorism and war; and other tragedies or catastrophes, can cause investor fear and panic, which can adversely affect the economies of many companies, sectors, nations, regions and the market in general, in ways that cannot necessarily be foreseen.

Portfolio Turnover Risk

A high portfolio turnover rate (100% or more) has the potential to result in the realization and distribution to shareholders of higher capital gains, which may subject clients to a higher tax liability. A high portfolio turnover rate also leads to higher transactions costs.

Preferred Stock Risk

Preferred stocks are stocks that entitle the holder to a fixed dividend, whose payment takes priority over that of common-stock dividends. Preferred stocks may be more volatile than fixed income securities and are more correlated with the issuer's underlying common stock than fixed income securities. Additionally, the dividend on a preferred stock may be changed or omitted by the issuer.

Prepayment Risk

Issuers of securities held in PIA portfolios may be able to prepay principal due on these securities, particularly during periods of declining interest rates. Securities subject to prepayment risk generally offer less potential for gains when interest rates decline, and may offer a greater potential for loss when interest rates rise. When debt obligations are prepaid or when securities are called, PIA may have to reinvest in securities with a lower yield. Prepayment risk is a major risk of mortgage-backed securities.

Risks Associated with Inflation and Deflation

Inflation risk is the risk that increasing prices throughout the economy may erode the purchasing power of an investment over time. Deflation risk is the risk that prices throughout the economy decline over time, which is the opposite of inflation.

Risks Associated with Mortgage-Backed Securities

These risks include Market and Regulatory Risk, Interest Rate Risk, Credit Risk, Prepayment Risk, and Extension Risk, as well as the risk that the structure of certain mortgage-backed securities may make their reaction to interest rates and other factors difficult to predict, making their prices volatile.

Risks Associated with Real Estate and Regulatory Actions

Although some of the securities in the Fund are expected to either have a U.S. Government sponsored entity guarantee or be AA rated by the three rating agencies, if real estate experiences a significant price decline, this could adversely affect the prices of the securities PIA owns. Any adverse regulatory action could impact the prices of the securities PIA owns.

Rule 144A Securities Risk and Reg-S Securities

The market for Rule 144A securities typically is less active than the market for publicly-traded securities. Rule 144A securities carry the risk that the liquidity of these securities may become impaired, making it more difficult for PIA to sell these securities.

Small Cap Equity Securities Risk

Investments in small-sized companies often pose greater risks than those typically associated with larger, more established companies. Examples include increased volatility of earnings and prospects, higher failure rates, and limited markets, product lines or financial resources.

To Be Announced ("TBA") Securities Risk

PIA invests in TBA securities. In a TBA transaction, a seller agrees to deliver a security at a future date, but does not specify the particular security to be delivered. Instead, the buyer agrees to accept any security that meets specified terms. TBA transactions involve the risk that the securities received may have less favorable characteristics than what was anticipated when PIA entered into the transaction. PIA accounts with TBA securities are also subject to counterparty risk and will be exposed to changes in the value of the underlying investments during the term of the agreement.

U.S. Government Securities Risk

Some U.S. Government securities, such as Treasury bills, notes, and bonds and mortgage-backed securities guaranteed by the Government National Mortgage Association (Ginnie Mae), are supported by the full faith and credit of the United States; others are supported by the right of the issuer to borrow from the U.S. Treasury; others are supported by the discretionary authority of the U.S. Government to purchase the agency’s obligations; still others are supported only by the credit of the issuing agency, instrumentality, or enterprise. Although U.S. Government-sponsored enterprises may be chartered or sponsored by Congress, they are not funded by Congressional appropriations, and their securities are not issued by the U.S. Treasury, their obligations are not supported by the full faith and credit of the U.S. Government, and so investments in their securities or obligations issued by them involve greater risk than investments in other types of U.S. Government securities. In addition, certain governmental entities have been subject to regulatory scrutiny regarding their accounting policies and practices and other concerns that may result in legislation, changes in regulatory oversight and/or other consequences that could adversely affect the credit quality, availability or investment character of securities issued or guaranteed by these entities.

Events surrounding the U.S. federal government debt ceiling and any resulting agreement could adversely affect a portfolio’s ability to achieve its investment objective. Downgrades by rating agencies could increase volatility in both stock and bond markets, result in higher interest rates and lower Treasury prices and increase the costs of all kinds of debt. These events and similar events in other areas of the world could have significant adverse effects on the economy generally and could result in significant adverse impacts on issuers of securities held by a portfolio and the portfolio itself. PIA cannot predict the effects of these or similar events in the future on the U.S. economy and securities markets or on a given portfolio. PIA may not timely anticipate or manage existing, new or additional risks, contingencies or developments.

Fluctuations in global demand for U.S. Government securities can significantly impact their values. Changes in the demand for U.S. Government securities may occur at any time and may result in increased volatility in the values of those securities.

Item 9. Disciplinary Information

PIA does not have disciplinary information to report.

Item 10. Other Financial Industry Activities and Affiliations

<u>Mutual Funds</u>

PIA is the investment adviser to five (5) mutual funds: PIA BBB Bond Fund, MACS; PIA High Yield Fund; PIA High Yield (MACS) Fund; PIA MBS Bond Fund, MACS and PIA Short-Term Securities Fund, which are overseen by U.S. Bancorp Fund Services and the Advisors Series Trust (“AST”). PIA’s financial interests in the Funds consist of investment advisory fees. Additionally, PIA employees, including portfolio managers of the PIA Funds are allowed to purchase, hold and sell PIA Funds in their personal accounts. Please see Fees and Compensation and Investment Strategies for more information on PIA’s mutual funds.

<u>Syndicated Capital</u>

PIA’s President and Director, Lloyd McAdams, and PIA’s Chairman, Heather U. Baines, are minority stockholders of Syndicated Capital, Inc. (“Syndicated Capital”), a registered broker-dealer, registered investment adviser and general insurance agency. PIA has no direct or indirect dealings with Syndicated Capital’s registered investment adviser.

Should Syndicated Capital accrue any profit or other benefit from executing trades for PIA's clients, Lloyd McAdams will receive personal economic benefits from the revenue received by Syndicated Capital. Lloyd McAdams is also a registered representative of Syndicated Capital, Inc., and in that capacity may receive compensation in relation to client account securities transactions executed through Syndicated Capital. Therefore, the receipt of this compensation could act as an incentive for him to execute transactions through Syndicated Capital, even if best execution could be achieved elsewhere. For this reason, it is PIA’s policy to not execute trades through Syndicated Capital’s broker-dealer unless directed to do so by a client, which PIA discourages. If so directed, Mr. McAdams would benefit from the revenue received by Syndicated Capital which could also create an incentive for Mr. McAdams to prioritize Syndicated Capital’s own profits over the best interests of the client when executing trades, especially where commissions or fees are earned for executing those trades. Additionally, Mr. McAdams has personal accounts managed by PIA that are invested in equity and fixed income strategies, for which trades are directed to Syndicated Capital’s broker-dealer.

<u>PIA Farmland, Inc.</u>

Lloyd McAdams, PIA’s President and Director, is the sole director and Chairman of PIA Farmland, Inc. (“PIA Farmland”). Heather Baines, PIA’s Chairman, and Joseph McAdams, PIA’s Chief Executive Officer, are officers of PIA Farmland and serve on its Investment Committee. PIA Farmland is a privately-held real estate investment trust incorporated in February 2013 that invests in U.S. farmland properties to lease to independent farm operators.

<u>Anworth Management, LLC</u>

PIA’s President and Director, Lloyd McAdams, PIA’s Chief Executive Officer, Joseph McAdams, and PIA Chairman Heather U. Baines are shareholders of Anworth Management, LLC, the former management company for a sole client, Anworth Mortgage Asset Corporation, a publicly traded REIT, which was acquired by Ready Capital Corporation in 2021. Anworth Management, LLC is also a former relying advisor of PIA.

Shared Office Space

PIA shares office space with another registered investment adviser which also serves as a sub-adviser for certain PIA strategies and is party to a sublease agreement with PIA. The office space is only used by this adviser on a limited basis; regardless, PIA has established procedures with respect to sharing office space designed to protect the interests of PIA clients.

Item 11. Code of Ethics, Personal Trading and Participation or Interest in Client Transactions

Code of Ethics and Personal Trading

To avoid potential conflicts of interest, PIA has adopted a Code of Ethics ("Code"). This Code provides employees with guidance in their ethical obligations to clients and governs their personal securities trading activities. PIA and its employees owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere to the general principles of the Code. The Code prohibits the holding of certain securities and outlines PIA's expectations to report personal trading, including exceptions to such reporting, reporting of political contributions, reporting of gifts, entertainment and other forms of non-cash compensation, and escalation and enforcement processes. A copy of PIA's Code in its entirety is available upon written request.

Participation or Interest in Client Transactions

Some employees may transact in the same securities as the client account. PIA recognizes that there is a risk that employees will compete with client accounts or otherwise engage in personal securities transactions at the expense of a client's interest. PIA's Code requires that all such transactions be carried out in a way that does not endanger the interest of any client. Where the account is a PIA advisory account, all trades are reviewed and approved by management and specific pre-determined allocation procedures are followed.

Mutual Funds

PIA is the investment adviser to five (5) mutual funds: PIA BBB Bond Fund, MACS; PIA High Yield Fund; PIA High Yield (MACS) Fund; PIA MBS Bond Fund, MACS and PIA Short-Term Securities Fund, which are overseen by U.S. Bancorp Fund Services and the Advisors Series Trust ("AST"). PIA's financial interests in the Funds consist of investment advisory fees. Additionally, PIA employees, including portfolio managers of the PIA Funds, are allowed to purchase, hold and sell PIA Funds in their personal accounts. Certain of these employees will be in possession of information relating to the mutual funds not available to other investors and prospective investors. As a result, as part of the Code, and other compliance policies and procedures of the adviser, employees will be subject to certain restrictions concerning these investments. Please see Fees and Compensation and Investment Strategies for more information on PIA's mutual funds.

Item 12. Brokerage Practices

Selecting Brokerage Firms & Best Execution

When the Firm has full discretion to select broker-dealers, PIA takes a two-step approach to selecting broker-dealers and executing client transactions. First, PIA's Portfolio Management Team creates and periodically updates an Approved Broker List of those broker-dealers it believes provide a sufficiently high level of qualitative service for its fixed income clients. The Portfolio Management Team considers the execution capabilities and capital strength and stability of brokers when creating and maintaining the Approved Broker List. Second, when executing trades, Portfolio Managers and Traders are permitted only to use those broker-dealers that are on the Approved Broker List.

As indicated in Item 4, PIA provides model portfolio investment recommendations to Sponsors without execution or additional services. The recommendations may be provided on a delayed basis relative to transactions of discretionary Client Accounts. The Sponsors and not PIA are responsible for selection of broker-dealers for all trades for their clients utilizing the model portfolio.

By following the above processes, PIA attempts to achieve best execution and mitigates the conflict of interest that may be produced by the association with Syndicated Capital as discussed in the *Other Financial Industry Activities and Affiliations* section of this brochure.

Research and other Soft Dollar Benefits

Section 28(e) of the Securities Exchange Act of 1934 provides a “safe harbor” to investment advisers who use commission dollars of their advised accounts to obtain investment research and brokerage services that provide lawful and appropriate assistance to the adviser in performing investment decision-making responsibilities. Conduct outside of the safe harbor of Section 28(e) is subject to the traditional standards of fiduciary duty under state and federal law.

PIA will not enter into any formal “soft dollar commitments/arrangements”, written or verbal, explicit or implied, with any broker-dealers. A soft dollar commitment/arrangement is viewed by PIA as a commitment, understanding or agreement to pay increased commissions, or direct trades to a broker- dealer, in exchange for the receipt of research. PIA may, however, effect transactions for clients with broker-dealers who provide PIA with research or brokerage products and services, providing lawful and appropriate assistance to the Firm in the performance of its investment decision-making responsibilities. Research and brokerage products and services received from broker-dealers are supplemental to PIA's own research efforts. PIA does not separately compensate broker-dealers with soft dollars for such products and services. As noted above, the Portfolio Management Team considers the full range and quality of a broker-dealer's services when placing brokerage to ensure that transactions are the most favorable under the circumstances.

Directed Brokerage

PIA does not direct, recommend, request or require that its clients direct us to execute transactions through a specified broker-dealer. PIA does accept and will place orders with brokerage firms pursuant to direction received from investment advisory clients ("directed brokerage"). If a client or wrap-fee sponsor specifically directs PIA to use a particular broker-dealer, such clients and/or the appropriate wrap-fee sponsor will not be able to participate in aggregate trades and may incur higher commission rates than other clients who allow PIA to have full brokerage discretion. These clients may also receive less favorable prices and execution.

Order Aggregation

Where possible, and when advantageous to clients, PIA will aggregate trades of accounts. Trade aggregation, or "bunching of orders," generally results in better execution and/or better-realized prices. Because of prevailing market conditions, it may not be possible to execute all shares of an aggregated trade, in which case PIA will allocate the trade among participating accounts in accordance with PIA's Allocation and Aggregation of Orders Policy.

In order to ensure that all portfolios are treated fairly, it occasionally becomes necessary to use an allocation process in those situations in which the security purchased is not in a sufficient quantity to be distributed to all portfolios in the desired portfolio holding percentage. The Portfolio Manager determines which process is fair and equitable with respect to the portfolios they manage. The methods employed include "pro-rata," whereby the same percentage is allocated to all portfolios even though the percentage is less than a normal allocation; and "rotation" whereby a full allocation is given to one group of portfolios and the next allocation is given to another group which rotates so that an attempt is made to give all groups an allocation over time.

Item 13. Review of Accounts

Periodic Reviews

The Investment Strategy Group is responsible for overseeing material changes to the portfolio strategies. However, the day-to-day portfolio decisions on implementing a portfolio strategy for each account are performed by PIA's Portfolio Managers. All portfolios are reviewed by Portfolio Managers on an ongoing basis. Furthermore, all accounts are reviewed at least quarterly by a Portfolio Manager to evaluate compliance with client objectives and to analyze portfolio rates of return.

Review Triggers

More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. If a rating on a security is downgraded below the minimum in the client's investment guidelines, the security will be reviewed by the Portfolio Manager for potential sale.

Regular Reports

PIA generally does not deliver regular reports to clients but will deliver reports to clients upon written request, including: asset listings, rate of return evaluations, economic analysis reports, asset allocation reports and investment strategy reports.

Item 14. Client Referrals and Other Compensation

Economic Benefit

PIA may from time to time receive research services from brokerage firms with which it trades. However, PIA does not direct brokerage to these firms in order to receive research services, nor is it obligated to do so. See the *Research and Other Soft Dollar Benefits* section for more information.

Referrals

PIA may enter into client referral agreements with unaffiliated third-party promoters where the promoters may refer prospective clients whose investment goals and objectives are compatible with PIA's investment approach. PIA may compensate the promoter through direct or indirect compensation in accordance with the requirements of Rule 206(4)-1 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. PIA compensates the promoter for the referral by paying a percentage of the advisory fee charged by PIA. Thus, the promoter has a financial interest in recommending PIA for investment advisory services. No client referred to PIA by a third-party promoter will pay a higher fee as a result of this compensation arrangement.

The promoter will disclose at the time of the solicitation whether they are or are not a current client of the firm; whether they will receive any cash or non-cash compensation for the referral; and will provide a statement that the receipt of compensation for a referral creates a conflict of interest. In addition, the promoter will provide each prospective client with a copy of a written disclosure statement disclosing the terms and conditions of the arrangement between PIA and the promoter, including the compensation the promoter will receive from PIA and any material conflicts of interest on the part of the promoter as a result of the referral arrangement.

PIA has established a marketing agreement with LarrainVial, under which LarrainVial promotes certain PIA mutual funds and SMA strategies to various parties. PIA will compensate LarrainVial based on a percentage of the net management fee received for business generated by LarrainVial in each delivery format. This agreement is structured to comply with Rule 206(4)-1 of the Advisers Act regarding endorsements and to ensure that affected clients receive appropriate disclosure.

Item 15. Custody

Custody

PIA is not a broker-dealer and does not take possession of client assets.

Client assets are housed in nationally recognized banks or brokerage firms, otherwise known as custodians. PIA has a limited power of attorney to place trades on the client's behalf. PIA has the authority to directly debit client accounts for quarterly fees for certain client accounts, and some clients direct their custodian to automatically debit and remit fees to PIA. See the Fee Billing section of this brochure. PIA requires that the custodian selected by the client send quarterly, or more frequent, account statements directly to our clients. We urge clients to compare the account statements they receive from the qualified custodian with any reports they receive from PIA.

Account Statements

The client will receive account statements directly from the broker-dealer, bank or other qualified custodian. PIA urges the client to compare the statement the client receives from the qualified custodian with any holdings report the client may receive from PIA.

Item 16. Investment Discretion

Discretionary Authority for Trading & Limited Power of Attorney

Unless otherwise agreed with a client in writing, PIA has complete discretion, in accordance with a limited power of attorney authorized in writing in the client's investment management agreement, over the selection of brokers and selection and amount of securities to be bought or sold without obtaining specific client consent. The only limitation on this discretion is that PIA must manage all client accounts in accordance with the portfolio's guidelines, applicable client restrictions and/or investment policy statements, and mutual fund investment guidelines.

Item 17. Voting Client Securities

Proxy Votes

In 2003 the Securities and Exchange Commission ("SEC") adopted Rule 206(4)-6 requiring formal proxy voting policies and procedures for SEC-registered investment advisers with voting authority over client portfolio securities. Pursuant to this rule, PIA has adopted a policy to vote proxies for portfolio securities, consistent with the best interests of its clients unless any client explicitly retains responsibility for proxy voting. PIA maintains written policies and procedures for the handling, research, voting and reporting of proxy voting, and makes appropriate disclosures about its proxy policies and practices.

Any conflict or potential conflict of interest that arises in the execution of PIA's proxy voting responsibilities will be referred to PIA's Compliance Committee who will review and resolve any such conflict in the best interest of all affected clients by either deciding how to vote the proxy or (unless the client is an ERISA client) requesting the client to vote their own proxies or abstain from any voting. In all cases, the conflict and any specific action taken will be disclosed to all affected clients.

Unless directed otherwise by a client in writing, PIA will vote proxies for its clients. If the client chooses to vote its own proxy, the proxy is made available through the custodian. At the client's request, PIA will be happy to consult with the client regarding items up for vote. Additionally, the client may direct PIA to vote proxies in a manner the client desires.

Other than for the five (5) PIA mutual funds, PIA will not advise upon or conduct or participate in any litigation, such as class action litigation, on behalf of clients arising from the client's ownership of assets held in the client's account. For example, if an issuer defaults on a bond, PIA will not advise any client on the merits of pursuing an adverse legal claim against the issuer and will not conduct any such claim on the client's behalf.

A complete copy of PIA's current Proxy Voting Policies and Procedures is available to clients upon written request. In addition, clients may obtain full information regarding how PIA has voted proxies for their account at any time by contacting PIA via phone at 310-393-1424, or by inquiring with their main contact at PIA.

Item 18. Financial Information

PIA has never been the subject of a bankruptcy petition and PIA is not aware of any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients. However, should PIA at some future date file for bankruptcy or should the principal owners decide to withdraw their capital, PIA may no longer be able to meet its contractual commitments to clients.

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Pacific Income Advisers, Inc.
Client Relationship Summary
March 27, 2025

Item 1: Introduction

Pacific Income Advisers, Inc. (our "Firm", "we") is registered with the Securities and Exchange Commission as an Investment Adviser.

Brokerage and investment advisory services and fees differ, and it is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me?

Our Firm offers discretionary and non-discretionary investment advisory services through multiple fixed-income and/or equity strategies, offered to retail investors through wrap fee programs and the mutual funds we manage. Account minimums are typically set by the wrap program sponsors. For our discretionary services, we select the securities to be bought and sold without asking you in advance. Investment limitations and restrictions on certain securities or types of securities are permitted and must be submitted to us in writing. Accounts are reviewed at least quarterly to evaluate compliance with your objectives and to analyze portfolio rates of return. For our non-discretionary services, we provide an investment portfolio model to your wrap program sponsor, who in turn invests your portfolio according to the model we provide.

FOR ADDITIONAL INFORMATION REGARDING OUR SERVICES, PLEASE SEE ITEM 4 IN OUR PART 2 BROCHURE LOCATED AT ADVISERINFO.SEC.GOV.

Ask us the following questions:

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?

You will pay one fee to the wrap program sponsor that includes all trading, transactions, reporting, custody and portfolio management costs. Fees are paid either monthly or quarterly, depending on your wrap program sponsor. Because the wrap program sponsor fee is inclusive of other costs, you will be paying a fee that is higher than typical asset-based advisory fees. The fee you pay is determined by separate contracts you enter with the wrap program sponsors. The annual wrap program sponsor fees typically vary between 1.00% and 3.00% of your assets under management. We are paid a portion of this fee by the wrap program sponsor. If you are invested in the mutual funds we advise, in addition to the wrap program sponsor fee, you will pay an operating expense ratio for the mutual fund.

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 ON YOUR INVESTMENTS OVER TIME. PLEASE MAKE SURE YOU UNDERSTAND WHAT FEES AND COSTS YOU ARE PAYING.

FOR ADDITIONAL INFORMATION REGARDING OUR FEES, PLEASE SEE ITEM 5 IN OUR PART 2 BROCHURE LOCATED AT ADVISERINFO.SEC.GOV.

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Pacific Income Advisers, Inc.
Client Relationship Summary
March 27, 2025

Ask us the following question:

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?

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. HERE ARE SOME EXAMPLES TO HELP YOU UNDERSTAND WHAT THIS MEANS.*

Because we charge you based on a percentage of your assets under our management, the more money you invest with us the more fees you will pay; therefore, we have an incentive to encourage you to increase the assets in your account.

FOR ADDITIONAL INFORMATION REGARDING OUR CONFLICTS, PLEASE SEE ITEM 10 IN OUR PART 2 BROCHURE LOCATED AT ADVISERINFO.SEC.GOV.

Ask us the following question:

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

How do your financial professionals make money?

The total compensation for portfolio management staff and marketing staff includes a base salary, bonus, employee benefits, and a 401(k) plan with matching contributions. The year-end bonus represents a subjective calculation of an individual's contribution to the firm's various portfolios and overall business success.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

Yes. Please visit Investor.gov/CRS, for a free and simple tool to research our firm and financial professionals.

Ask us the following question:

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

Item 5: Additional Information

Additional information regarding our fees, services, and conflicts, can be found on the IAPD system website located at adviserinfo.sec.gov, or on our website at https://www.pacificincome.com/. Please contact us at **310-393-1424** or by email at **info@pacificincome.com** for more up-to-date information or to request a copy of this Client Relationship Summary.

Ask us the following questions:

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?