Gaines Capital Management LLC

Form ADV Part 2B Brochure - Individual Disclosure Brochure for:

Aaron Gaines, CFP©

Personal CRD Number: 6288705

Investment Adviser Representative

Updated: March 18, 2026

Business Address:
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This brochure provides information about Aaron Gaines that supplements the Gaines Capital Management LLC brochure. You should have received a copy of that brochure. Please contact Aaron Gaines if you did not receive Gaines Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Aaron Gaines is also available on the SEC's website at www.adviserinfo.sec.gov

Item 2: Educational Background and Business Experience

Name: Aaron William Gaines

Born: 1990

Education:

- The University of Alabama, Finance, Investments and Securities (2010 - 2014)
- Series 7 (General Securities Representative Examination), obtained 05/04/2016
- Series 66 (Uniform Combined State Law Examination), obtained 06/27/2016
- Securities Industry Essentials (SIE) Examination, obtained 10/01/2018

Business Experience:

- Gaines Capital Management LLC, Managing Member/Chief Compliance Officer (03/2025-Present)
- World Equity Group, Inc., Registered Representative (07/2019 - 04/2025)
- Nicholas Wealth Management, Financial Advisor (04/2019 - 04/2025)
- BluePath Capital, LLC, Investment Adviser Representative (04/2019 - 04/2025)
- Edward Jones, Financial Advisor (02/2016 - 03/2019)
- Ty Young, Junior Advisor (06/2015 - 01/2016)

Professional Designations

Certified Financial Planner (CFP®) professional

Mr. Gaines is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

***Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.*

Examination *– Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.*

Experience *– Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.*

Ethics *– Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.*

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

Ethics *– Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.*

Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3: Disciplinary Information

Mr. Gaines has not been involved in any legal or disciplinary events that would be material to a client's evaluation of his integrity or ability to meet contractual commitments to clients.

Item 4: Other Business Activities

Aaron Gaines is licensed to sell insurance products and provides insurance services as an outside business activity through GCM Wealthshield LLC, an insurance agency. This activity represents a substantial portion of Mr. Gaines' time and income. This creates a conflict of interest as Mr. Gaines receives commissions and other compensation from insurance product sales, which may create an incentive to recommend insurance products based on compensation rather than solely on client needs.

To mitigate this conflict, all insurance product recommendations will be made in the client's best interest, and clients are under no obligation to purchase insurance products through Mr. Gaines or GCM Wealthshield LLC. Clients may purchase insurance products through other agents or agencies of their choosing. All material conflicts of interest and compensation arrangements will be disclosed to clients prior to any insurance product recommendations, and clients are encouraged to compare products and pricing from multiple sources before making any insurance purchase decisions.

Item 5: Additional Compensation

Mr. Gaines does not receive any economic benefits from non-clients for providing investment advice to clients.

Item 6: Supervision

Aaron Gaines serves as the Chief Compliance Officer and Managing Member of Gaines Capital Management LLC. In this role, he oversees all supervision, formulation, and monitoring of investment advice provided to clients. Mr. Gaines implements and maintains the firm's compliance policies and procedures and adheres to a strict code of ethics.

Due to his position as Managing Member, Mr. Gaines does not have a direct supervisor. However, he has established and implements comprehensive oversight measures to fulfill his compliance obligations. These measures include conducting systematic reviews of all client accounts and transactions on a regular basis. He maintains detailed documentation of every client meeting and all investment recommendations made to clients. The firm maintains written policies and procedures that are reviewed and updated regularly to reflect current regulatory requirements.

To ensure ongoing compliance, Mr. Gaines performs regular self-audits of all compliance processes and engages outside compliance experts for additional guidance when necessary. He participates in continuing professional education and training programs to maintain and enhance his expertise. Additionally, he consistently monitors and reviews regulatory updates and requirements to ensure the firm's practices align with current regulations.

Clients and prospective clients may contact Mr. Gaines directly at (678)-899-5161 regarding any aspects of the firm's operations, including its investment advisory services, account management practices, supervision procedures, or compliance policies. All inquiries will receive a prompt response during normal business hours.

Item 7: Requirements for State Registered Advisers

A. Mr. Gaines has NOT been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following: a) an investment or an investment-related business or activity; b) fraud, false statement(s), or omissions; c) theft, embezzlement, or other wrongful taking of property; d) bribery, forgery, counterfeiting, or extortion; or e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: a) an investment or an investment-related business or activity; b) fraud, false statement(s), or omissions; c) theft, embezzlement, or other wrongful taking of property; d) bribery, forgery, counterfeiting, or extortion; or e) dishonest, unfair, or unethical practices.

B. Mr. Gaines has NO relationship or arrangement with any issuer of securities.