

**Sterling Wealth Advisors**

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# **Sterling Wealth Advisors**

## **What's Inside...**

	<b>Page</b>
I. Our Mission	2
II. Our Canon of Ethics	3
III. Elizabeth A. Barrett, MA, CFP®, AIF®	4
IV. How Can We Help You?	5
V. What Makes Us Different?	6
VI. Levels of Service	7
VII. Services Included in Full Financial Planning Retainer	8
VIII. Fee Schedule	9
IX. 10 Reasons Why Clients Like Our Retainer	10
X. Facts About Finding Financial Advisors	11
XI. Frequently Asked Questions About SWA	12
XII. Notes Regarding Client and Professional References	14
XIII. Privacy Statement	15
XIV. Articles of Interest	16
XV. Our Form ADV	28

## **OUR MISSION**

To help our clients realize their life goals through defining, planning, and protecting their long-term financial security in a manner which warrants their trust in both our judgment and our care.

We adhere to the following precepts:

### **EXPERTISE**

We will continually educate ourselves to stay current on new developments affecting our clients and gain ever expanding knowledge and expertise to benefit our clients. We not only set aside money in our budget for this, but also time on our calendars. As professionals, we continually take *twice* as many continuing education credits as required for our licenses.

### **EDUCATION**

We will educate our clients about their finances and their options in obtaining their goals. We want our clients to be active participants in the definition and achievement of their financial goals.

### **ETHICS**

We will always act as a fiduciary advisor, removing as many conflicts of interest between our clients and ourselves as possible. We will reject all commissions, rebates, referral fees and any other compensation that could interfere with our judgment. *Our only compensation will be what we receive directly from our clients.*

### **EXPENSE**

We will continually strive to find the most cost-efficient investments whereby you can achieve your financial goals.

### **ENJOYMENT**

We want everyone involved to feel a sense of fulfillment and enjoyment in the planning process. We will maintain an attitude of mutual respect, genuine concern and a sense of humor.

## ***OUR CANON OF ETHICS***

### **Sterling Wealth Advisors will:**

- ◆ Agree that our single primary purpose is to provide education to our clients and help them to achieve their goals.
- ◆ Conscientiously complete all work contracted for and pay any monies agreed to be paid in a prompt and timely manner.
- ◆ Agree to act objectively in all matters with clients and not direct clients into investments or products for commissions or kickbacks. Client fees are our only source of compensation.
- ◆ Never indulge or participate in any matter or activity involving fraud, backdating of documents, etc.
- ◆ Recognize that our common welfare depends on continuing education and therefore will assiduously take advantage of continuing education programs to improve our professional competence.
- ◆ Agree to maintain education services for clients beyond the scope agreed to in the retainer agreement, which shall include seminars, dinners, etc.
- ◆ Not advertise on press, radio, films, or any other media. Our business is based on referrals from satisfied clients rather than promotion.
- ◆ Agree never to endorse, finance or lend the Sterling Wealth Advisors name to any related facility or outside enterprise.

## ***Elizabeth A. Barrett, MA, CFP® , AIF®***

Elizabeth serves as owner, president, and senior financial planner of Sterling Wealth Advisors, Inc., a registered investment advisor. She is a CERTIFIED FINANCIAL PLANNER™ and an Accredited Investment Fiduciary® designee. She focuses her expertise in the areas of tax planning, estate planning, retirement planning, and investment management. Her insights have led her to become a requested speaker for seminars, workshops, and radio programs and to be interviewed by financial magazines. She has been quoted in *The Miami Herald*, *The Sun-Sentinel*, *Smart Money*, *Forbes*, *Money*, and *Kiplinger's Personal Finance*.



Elizabeth holds a master's degree in counseling psychology. Because of her extensive training in this area, she has the unique advantage of helping her clients understand their personal psychological beliefs regarding wealth, which often impact the way they attain their financial goals.

Elizabeth is a member of the [Alliance of Cambridge Advisors](#), a national association of fee-only personal financial advisors offering comprehensive personal financial planning. She is also a member of the [National Association of Tax Professionals](#) and the [Financial Planning Association](#).

Elizabeth is very active in her community, having served on the board of The Financial Planning Association, The National Association of Women Business Owners, and The Business Advisory Council and as a diplomat at The Tower Club in Ft. Lauderdale.

Elizabeth prides herself on maintaining close client relationships. Her practice has grown primarily through referrals of current clients.

Elizabeth is a devoted mom to her delightful young son, Sterling. She is also an avid reader, enjoys photography, and loves to travel. She has a passion for life and for the people who are a part of hers.

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## ***HOW CAN WE HELP YOU?***

- 1. We help you define what you want out of your life, and how your financial situation can be adjusted so that you can lead a happier, more prosperous and more fulfilling life.**

We strive to help you identify your personal goals and your personal definition of fulfillment. We then help you map out a journey that will get you, year-by-year, closer to those goals.

- 2. We help you handle all the vexing, complicated issues surrounding money.**

Getting everything organized in one place is an important step in the process of knowing exactly what you have and how it's working to move you toward your goals.

- 3. We help you by acting as a buffer between your emotions and your investment behavior.**

We have seen how greed, hype, fear, despair and pride slip right past the governors of the rational mind and result in investment decisions that range from bizarre to self-destructive. A financial advisor helps block that direct emotional connection with your portfolio. We look at the situation objectively, and remind you of the investment policy statement we came up with together and why those policies needn't change because of some extraneous factor(s).

- 4. We serve as an information filter of financial matters for clients and the public at large.**

When you go to Yahoo and ask the service to find everything that relates to "financial planning," you get more than 1.5 million hits. You also have Money, Kiplinger's, Smart Money, Worth, Fortune, Forbes, Bloomberg's, Barron's, The WSJ, CNBC, CNN, etc. It's hard to know what, of all this stuff streaming past your eyeballs, is significant and relates to you and your personal life. There is no shortage of raw intelligence that you are bombarded with everyday. We provide meaningful intelligence, perspective, wisdom, experience and expertise.

Remember: a lot of information is free...but wisdom-*that* is sold separately.

# WHAT MAKES US *DIFFERENT*?

**1. Sterling Wealth Advisors is one of only a few Fee Only Certified Financial Planners™ in the area:**

Only 1% of financial planners are compensated directly and only from their clients.<sup>1</sup> We are FEE-ONLY Advisors (NOT to be confused with “fee based”, which is a combination of fees *and commissions*.) We believe it is only fair that clients know exactly what price they are paying. We also realize that you want your financial advisor to be “sitting on your side of the table.”

**2. We offer different levels of service for different client needs. We don't think you have to “meet a minimum” in order to benefit from good financial planning.**

While we can provide “do it yourselves” with a complete financial plan, we find that most of our clients prefer to retain us throughout the year. They know that their financial lives are constantly evolving, and like the idea that objective advice is always just a phone call or email away.

We view financial planning as an interactive, ongoing and progressive event in which we feel very privileged to partner with clients in defining, and then accomplishing, their life dreams.

**3. We understand that if you do what everyone else does, you won't end up being financially independent. (Or else most people would be financially independent!)**

Financial planning is more than a purely intellectual process. We not only help you meet your financial goals, but help you figure out your Ideal Calendar, and then help you to achieve it. After all, financial goals are mere tools that people use to realize their dreams. We start by taking realistic steps toward accomplishing goals in the next 90 days, 6 months and 1 year, gradually moving toward reaching the exciting big goals. Many financial decisions are made emotionally. Many times the biggest determining factor in your financial life isn't the rate of inflation or how well Large Cap Growth funds perform, but how you may allow fear and greed to influence your financial decisions.

**4. We aren't going to try to sell you anything. You are paying us for objective advice.**

We respect that you are intelligent and need objective advice. We want you to become educated and feel confident in making financial decisions.

**5. We ask you a lot of questions so we can do a complete job.**

If a job is worth doing.... it's worth doing right. And for us, that means initiating a complete, comprehensive review of your financial assets and integrating all the pieces together. We include everything, from helping you understand your credit score, to teaching you how to pick a good mutual fund, to determining which retirement plan you should fund first. We also include tax planning and preparation in our services because we know that without reducing the amount you owe in taxes, the road to financial independence is much longer. We find that the most successful and effective plans are those where everything is working together toward one common goal. Goals are reached much faster when all pieces of the train are all running on the same track.

**6. We want your feedback... Always. Positive or Negative.**

We survey all clients so that we can use this feedback to improve our services. It's because of this feedback that we learned that instead of long, complicated reports, you want to know “how am I doing in reaching my goals?” We help you monitor that progress. Clients have also praised our open retainer, stating that they have “peace of mind” knowing we are “always in their corner.”

**7. We want you to be part of the process.**

We have structured our meetings so that we are able to accomplish as much as possible while you are with us. By participating in the process, you not only learn a great deal, but you also share ownership in the plan's design.

1. Data received from NAPFA., National Association of Personal Financial Advisors

# ***Sterling Wealth Advisors***

## ***LEVELS OF SERVICE***

1. **Full Financial Planning and Investment Advisory Retainer:** This provides ongoing, comprehensive financial planning and investment advisory services. During the first year we start with completing a full financial plan upfront, (#2 below) which includes goal setting, cash flow analysis, insurance review, investment planning, tax planning, retirement planning and estate planning. All relevant financial issues are discussed, such as college funding, long-term care insurance, consolidating investment accounts, etc. During the second year and beyond, there are typically one to three meetings to review your plan and make any changes necessary. This open retainer includes extensive, open-ended service for any financial matters that may arise during the year. Monitoring of investment accounts with the Institutional branch of Charles Schwab is also included. The minimum for a full retainer in the first year is \$5,000 and \$3,500 for years 2 and thereafter. The fee is based upon the complexity of the client's financial situation and the investment assets. Refer to the next page for a more detailed description of the services provided to full retainer clients.
  
2. **Initial Financial Plan Only:** Customized retirement plan and financial plan with specific investment recommendations. This plan is very comprehensive and completely tailored to the client's specific concerns and financial situation. The plan does not include help with *implementation* of any recommendations (i.e., investments, wills, tax preparation, etc.). The Advisor team spends approximately 25-40 hours to develop and present the plan to the client. The initial financial plan fee begins at \$4,500. The fee is increased based upon the complexity of the client's issues. One half of this fee is due at the time the Financial Plan Agreement is signed. The balance is due when the plan is presented to the client. When the analysis has been performed and the recommendations have been presented to the client, the engagement is complete.
  
3. **Consulting/Project Retainer:** This is a level of service for clients with less than \$200,000 in investment assets. This does *not* constitute a comprehensive financial plan, and does not include implementation of any recommendations. Since we believe this arrangement is rarely in the client's best interest, we reserve the right to refuse to only consult on one financial area when we believe it's not in the best interest of the client. Minimum fee \$2,500.
  
4. **Financial Overview:** This is an overview of a client's financial situation. The client will receive an overall review (including a net worth summary) with basic recommendations for improvement. The recommendations will be presented in one two-hour meeting with Elizabeth Barrett, MA, CFP®, AIF®. The fee for a Financial Overview is \$950. A \$100 discount will be applied for family members of current clients or for referral by a current client. A \$200 discount will be applied to children of current clients.

## ***SERVICES INCLUDED IN THE FULL FINANCIAL PLANNING AND INVESTMENT ADVISORY RETAINER***

- ◆ Ongoing, comprehensive financial planning and investment advisory services throughout the year.
- ◆ A comprehensive financial plan.
- ◆ Ongoing advice regarding 1) achieving financial goals 2) cash flow/budgeting 3) insurance needs 4) tax planning 5) gifting strategies 6) mortgage issues 7) issues involving employers and job changes 8) investment issues 9) college funding 10) estate planning issues.
- ◆ Ongoing cash flow management with monthly automatic distributions and/or contributions, dollar cost averaging into investments, etc.
- ◆ Assistance in consolidating investment accounts and transferring assets.
- ◆ Emphasis on education of the client on financial issues.
- ◆ Objective review of all insurance policies.
- ◆ Assistance with formulating and revising estate plans; joint meetings with estate planning attorneys as requested.
- ◆ Issues related to small business ownership, such as retirement plan recommendation and formulation, tax saving ideas, etc.
- ◆ Advisor available to accompany client to meetings with accountants, insurance agents and attorneys as requested.
- ◆ One to four meetings a year with clients (after initial plan is set up).
- ◆ Explanation of Estate Planning documents and terms.
- ◆ Track funding of client's retirement plans.
- ◆ Help consolidate unneeded accounts to simplify the client's financial affairs.
- ◆ All client appointments, phone calls, etc.

# ***FEE SCHEDULE FOR COMPREHENSIVE FINANCIAL PLANNING AND INVESTMENT ADVISORY RETAINER***

In certain instances, depending on the client’s needs and the services to be performed by Sterling Wealth Advisors, a contract may be entered into with a different fee schedule than the fee schedule set below. This fee would be based upon individual negotiations with the particular client within the range of fees set forth below for minimum and maximum fees.

A client may terminate at any time. The following fees are charged on an annual basis, ½ of the quoted flat fee is due at the signing of the retainer and ½ is due in 6 months. All payments are due immediately. Once fees are agreed to, they are non-negotiable. Investment assets are determined based upon investment account statements dated within 90 days of the engagement.

The minimum fee is \$4,500 for a complete financial plan. For clients who choose to engage Sterling Wealth Advisors to provide ongoing financial planning services and investment advisory implementation services, the minimum financial planning retainer is \$5,000 (which includes the initial plan preparation), plus a fee for investment implementation based on the assets under management as follows:

<u>Assets</u>	<u>Annual Fee</u>
First 5,000,000 .....	1.00%
Next 5,000,000 .....	0.50%
Additional assets .....	0.35%

Refunds: A client can terminate the contract engagement at any time upon receipt of written notice. Sterling Wealth Advisors will reimburse the client for any unearned or unapplied fees paid. All clients may terminate their agreement within 5 business days of signing their initial agreement and be reimbursed 100% of their fee.

Billing: For Financial Overview, Consulting/Project, and clients receiving only a Complete Financial Plan, 50% of the quoted fee is due upon engagement, and the remainder is due upon completion of the project or plan.

For new clients receiving ongoing financial planning and investment implementation services, annual fees will be determined upon signing the contract for the first year of service, (which may coincide with the calendar year). After the first anniversary of the contract, the fee will be prorated from the first anniversary to the end of that calendar year, when the client will join existing clients in a January-December fee year.

## **10 REASONS WHY CLIENTS LIKE OUR RETAINER**

1. An analogy might be a desire to get into good physical shape. You could hire a “personal trainer” one time to devise a **good** plan for you and then follow the plan. Or, you could reach your goals **faster and easier** if you hired a personal trainer that you met with regularly. They would help keep you **focused and accountable**, consistently partnering with you to help you meet your goals.
2. Because client’s **lives are constantly changing** (their goals change, their 401(k) choices change, their relationships change, etc.). Clients appreciate that we are always there when the changes occur. They never have to hesitate in calling or emailing us, faxing us something to review, or setting up a meeting.
3. Because they realize that the **tax and investment world is constantly changing**. It’s difficult to stay up to date on the latest tax changes, new investment products, their portfolio, etc. And they realize that not staying on top of these changes could mean they work harder and longer to reach their goals.
4. Because, generally, people should **focus** on their “**core competencies.**” Most successful people **hire professionals** to help them leverage their time and resources.
5. Because life is shorter than we’d like and there is only so much **time**. *While money is replaceable, time is not.* We all want more time to spend with the people we cherish.
6. Most people have failed financially in the past because of one of the following reasons: they **procrastinated** spending the time to set realistic goals and start working towards them; they relied on the wrong **source(s) for advice**; or they didn’t **stay on track**. Our retainer is specifically designed to make sure these problems don’t continue to hold clients back from achieving their financial goals.
7. We take care of many of the **details**. As one example, we open your accounts, explaining the function of each, and then we can help you transfer or consolidate your assets. A “second pair of eyes” always helps when it comes to all the numbers in your life.
8. We are able to help clients **NOT do** many things that they otherwise would have done. Sometimes our value is in helping clients do something; other times, it is in helping them to decide not to do something.
9. Many times we are able to **save** clients the cost of their retainer through aggressive tax planning, insurance savings, keeping “loafing” assets working, reallocating assets for tax efficiency, etc.
10. Because when the time comes that you or your family really need someone...that’s not the time to start looking for someone. Clients know that their spouse or family just needs to call us in the event of an emergency. We will do everything we can to ease the stress and help them take care of all the details.

# ***FACTS ABOUT FINDING FINANCIAL ADVISORS***

## **How are financial planners paid?**

There are 3 basic ways in which financial planners are paid:

- 1) **Commissions:** The majority of financial planners are paid under this method. Even if the product the planner is recommending is in fact good for the client, the client may harbor doubts since the planner's compensation is dependent upon the product they select. Many insurance sales people and "brokers" now call themselves "financial advisors/planners," while their main goal is still to sell products.
- 2) **Fee Based or Fee Offset:** This has become popular in the last couple of years because use of the term "fee" causes many people to think the planner is only compensated by the client. "Fee based" means that the planner may earn a fee from the client, but most often will *also* earn commissions. Some firms will charge a client a small fee for the financial plan and then earn commissions when the client implements the plan.
- 3) **Fee Only:** These planners are only paid from one source- their client. If we recommend an insurance agent or mortgage broker, there are no referral fees paid to us. While some Fee-Only planners receive third-party fees, we do not.

## **This is what the financial press has to say about Fee-Only Financial Planners:**

*NEWSWEEK-Jane Bryant Quinn*

"Financial Planners who take commissions have a built-in conflict of interest....even with disclosure, my choice would be a fee-only planner."

*MONEY MAGAZINE*

"Start with a good general practitioner...a Financial Planner (whose) compensation should be from fees alone."

## **Financial Advisors versus CFP®s**

There are 57 designations for a financial planner, so it is confusing. Anyone can "call" him or herself a financial planner, and as a result there are many, many people that do. It's important to find a Certified Financial Planner™ Professional. The most desirable credential for comprehensive financial planning is the CFP®. Planners who earn this credential will list it after their name on their business card. In order to obtain the CFP®, a planner must complete approximately two years of education, have three years of supervised experience and pass a difficult two-day comprehensive exam.

The CFP board exam tests their knowledge on all aspects (investment, insurance, tax, retirement planning and estate planning) of financial planning. The pass rate on this exam is approximately **56%**, making it a difficult credential to obtain. You may check a planner's certification at [http://data.cfp-board.org/nd\\_licensee\\_us\\_form.asp](http://data.cfp-board.org/nd_licensee_us_form.asp). This database on the CFP® website includes all planners authorized to use the certification marks as well as those who have been disciplined by the CFP® Board.

## ***FREQUENTLY ASKED QUESTIONS ABOUT STERLING WEALTH ADVISORS***

- 1. What is Sterling Wealth Advisors?** Sterling Wealth Advisors is a personal financial and tax planning firm registered with The Florida Department of Banking and Finance as a Registered Investment Advisor. The file number is 55224. Sterling Wealth Advisors works as needed on a contract basis with clients. It is the policy of our firm that all employees providing advice to clients hold a bachelor's degree, have experience in fields directly related to financial planning and/or have the required examinations and qualifications to act as an investment advisor representative. Our ADV provides details of the educational and business backgrounds of all members of our firm who provide advice to clients.
- 2. What is a Registered Investment Advisor?** A Registered Investment Advisor is a fiduciary who has a duty of undivided loyalty to his or her clients and must deal fairly and honestly with them. A Registered Investment Advisor is a representative of the client.
- 3. How much does Sterling Wealth Advisors charge?** We are Fee-Only advisors, which means we are only compensated by our clients. Included in this packet is a detailed outline of our fee structure. There are some instances where we work with clients by the project or on an hourly basis. Your retainer agreement will contain the specific information of how your retainer fee is calculated.
- 4. What does Sterling Wealth Advisors sell?** Sound financial planning advice regarding taxes, investments, insurance, pensions, retirement, estate planning and general matters. We do not sell any financial products or receive any third-party fees, such as commissions.
- 5. Who do we serve?** Individuals, including business owners.
- 6. Who can benefit from our services?** Anyone who has financial, tax, investment or estate issues, or who wishes to plan prudently for his or her financial future. Furthermore, persons who desire a higher, more sophisticated level of financial planning services may find our program appealing.
- 7. How much money do you need to work with us?** While there is no minimum asset requirement, typically, our new clients have assets of at least \$500,000.
- 8. What is a financial plan?** An in-depth review of your financial situation, taking into account your goals and objectives and focusing on income tax planning, specific investment recommendations, estate planning, risk management, education planning and retirement planning. The plan analyzes and recommends ways that you can achieve your financial objectives.
- 9. Are the fees tax deductible?** Yes. Section 212 of the Internal Revenue Code permits an itemized deduction for tax and/or investment advice. It can be found in the miscellaneous section of Schedule A and is subject to a 2% floor of your adjusted gross income. Clients who own their own business, have a farm or rental property, or who buy and sell investments may also be able to deduct a portion of the fee on the corresponding schedule(s).
- 10. Do we sell financial planning products, such as mutual funds, insurance and tax shelters?** No. We are fee-only planners and therefore do not sell any products. Products must be purchased by clients from a variety of other sources. We will suggest investments you can make without paying commissions and guide you in your purchase. We are listed financial advisors with Charles Schwab and Co., Inc., a discount broker. You may choose to set up accounts through Schwab, or any other brokerage firm of your choice.

11. **Does Sterling Wealth Advisors provide only complete programs?** For clients with minimal assets, we may do a “financial overview” or “project” where we review just one area of a client’s finances, such as a portfolio or a tax analysis.
12. **Do we provide legal services?** No. However, we can refer you to attorneys if needed.
13. **What type of securities do you provide advice for?** Individual stocks, corporate bonds, certificates of deposits, municipal securities, mutual funds, variable annuities, US government securities, option contracts on securities, and limited partnerships.
14. **What method of analysis do we use to analyze investments?** We do not use technical analysis or charting. We do use fundamental approaches, taking into consideration factors such as economic conditions, industry outlook, politics (as it relates to the investment), historical data, price-earning ratios, dividends, earnings, the general level of interest rates, company management and tax benefits. Our main sources of information are financial newspapers and magazines, research from member aggregations, research materials prepared by others, and annual reports, prospectuses and filings with the Securities and Exchange Commission.
15. **Do we guarantee investment performance?** No
16. **Will client information be kept confidential?** Yes. It is the law.
17. **Once a plan is completed, will our relationship end?** It should not. Financial planning is a process, not an event. We provide an annual, semi-annual or quarterly analysis of your net worth to assess diversification and review investments. Tax planning is done on annually. We are also available as needed for financial advice upon your request.
18. **Do you offer money management?** Yes. But we reserve the right to select accounts. Assets may be managed by directed portfolios under a limited power of attorney, with the client retaining custody of all funds.
19. **How do we get started?** Contact us at (954) 771-1313, or at [info@sterlingwealthadvisors.com](mailto:info@sterlingwealthadvisors.com) to set up an initial consultation.

*Note: This brochure is provided in addition to a copy of our ADV Part II filed with the Florida Office of Financial Regulation. If you have any questions, please do not hesitate to ask us.*

## ***NOTES REGARDING CLIENT REFERENCES AND PROFESSIONAL REFERENCES***

Providing client references or professional references is a very sensitive issue. “Testimonials” are prohibited under the Investment Advisors Act of 1940. Rule 206(4)-1(a)(1) prohibits Registered Investment Advisors from publishing, circulating, or distributing any advertisement “which refers, directly or indirectly, to any testimonial of any kind concerning the Investment Advisor, or concerning any advice, analysis, report or other service rendered by such Investment Advisor.”

The Securities and Exchange Commission, Division of Investment Management, stated in a no-action letter in July 1993, to Denver Investment Advisors, Inc., that it allows an Investment Advisor to provide a partial list of clients or professional references in its marketing materials provided that three conditions are met:

1. The Advisor does not use performance-based criteria in determining which clients or professional references to include on the list.
2. The list must include a disclaimer stating, “it is not known whether the listed clients or professional references approve or disapprove of the Advisor or the advisory services provided.”
3. The partial client or professional reference list must include a statement disclosing the objective criteria used to determine which clients or professional references were included on the list.

Accordingly, Sterling Wealth Advisors, makes the following statements:

Should you request a list of Client and/or Professional References,

1. Portfolio performance is not used as a criterion in providing references.
2. Although permission from clients and professional references has been obtained prior to giving you their names, the clients or references on this list have not been contacted recently prior to your inquiry. They are unaware of whom you are and that you have received their name. You should clearly identify yourself and explain the purpose of your call. It is not known whether the listed clients or references approve or disapprove of Sterling Wealth Advisors, or the advisory services provided.
3. The objective criteria used to determine the names of clients or references provided to you include: client age, similarity of client’s life situation, similarity of the client’s financial issues (e.g., investments, retirement planning, estate planning), proximity of the client to you, and availability of the client or reference to answer the phone during the day or evening when you are most likely to call.

We trust that you will respect the privacy and confidentiality of the planner-client relationship in your inquiries with all clients and professional references.

## ***PRIVACY STATEMENT***

Sterling Wealth Advisors is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic data that we collect from you may include information about: your personal finances; your health to the extent that it is needed for the financial planning process; transactions between you and third parties; and your credit report from consumer reporting agencies. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, e-mail, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf that you have authorized.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ two levels of firewall barrier and use authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial services companies, consultants, and auditors. Federal and state securities regulators may review our company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client and for the period thereafter that federal and state securities laws require records to be maintained. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Statement* to you annually in writing.

***ARTICLES OF INTEREST***

## ***DISCLOSURE FORM (Part II – Form ADV)***

Under law, investment advisors must deliver a written disclosure form to clients when entering into an advisory contract. The purpose of this form is to give the client important information on the advisor's background, services, compensation and other aspects of his or her business practice. This disclosure information is found on Part II Form ADV, which is filed with the appropriate federal or state regulatory agencies.

To help you understand our background, services, and client-centered business philosophy, we are providing you with our Part II-Form ADV. The purpose of the ADV (or Disclosure Form) is to help make you aware of business practices in our industry so that you can learn how to be better “financial consumers” and know what questions you need to ask of any financial professional before doing business.

For example, in our Disclosure, you will note that we do not pay others to refer clients to our firm. You may be surprised to learn how many “respected” advisors now do just that, and how many consumers are not aware of that practice. And if we ever refer you to another professional or firm, you can be assured that we do not receive payment in return. We think that your trust and confidence is worth more than that.