**Item 1 Cover Page**

# Sterling Financial Planning, Inc.

SEC File Number: 801 – 56025

ADV Part 2A, Firm Brochure

Dated: February 27, 2019

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**This Brochure provides information about the qualifications and business practices of Sterling Financial Planning, Inc. If you have any questions about the contents of this Brochure, please contact us at (973) 729-1234 or btucker@sterlingadvice.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Sterling Financial Planning, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.**

**References herein to Sterling Financial Planning, Inc. as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.**

## Item 2 Material Changes

Since the March 15, 2018 annual update filing, this Brochure has been materially amended at Item 4.A. to update "principal" ownership as more fully set forth on Form ADV Part 1, Schedule A "Direct Owners and Executive Officers."

**Sterling Financial Planning, Inc.'s Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client has about this Firm Brochure**.

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## Item 4 Advisory Business

A. Sterling Financial Planning, Inc. (the "Registrant") is a corporation formed on November 20, 1992 in the state of New Jersey. The Registrant became registered as an Investment Adviser Firm in February 1993. The Registrant is principally owned by Nicholas A. Nicolette.

B. As discussed below, the Registrant offers to its clients (individuals, high net worth individuals, pension and profit sharing plans, trusts and estates, etc.) investment advisory services, retirement plan consulting services, and, to the extent specifically requested by a client, financial planning and related consulting services.

**INVESTMENT ADVISORY SERVICES**

The client can determine to engage the Registrant to provide discretionary and/or non-discretionary investment advisory services on a *fee* basis according to the terms and conditions of an Investment Advisory Agreement. The Registrant's annual investment advisory fee is based upon a percentage (%) of the market value of the assets placed under the Registrant's management.

Before Registrant provides investment advisory services, an investment adviser representative will ascertain each client's investment objectives. Thereafter, the Registrant will allocate and/or recommend that the client allocate investment assets consistent with the designated investment objectives. Once allocated, the Registrant provides ongoing monitoring and review of account performance and asset allocation as compared to client investment objectives and may periodically execute or recommend execution of transactions for the account based upon those reviews.

**FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent requested by a client, the Registrant may determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. Before engaging the Registrant to provide planning or consulting services, clients are generally required to enter into a Financial Planning and Consulting Agreement with Registrant setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Registrant commencing services. If requested by the client, Registrant may recommend the services of other professionals for implementation purposes, including the Registrant's supervised persons in their individual capacities as licensed insurance agents. (Please refer to Item 10.C. in this respect). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. The preceding sentence shall not limit or waive any applicable rights under federal or state law, including securities laws and fiduciary obligations that cannot be limited or waived. It remains the client's responsibility to promptly notify the Registrant if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Registrant's previous recommendations and/or services.

## RETIREMENT PLAN CONSULTING SERVICES

The Registrant also provides retirement plan consulting services, pursuant to which it assists sponsors of self-directed retirement plans with the selection and/or monitoring of investment alternatives (generally open-end mutual funds) from which plan participants may choose in self-directing the investments for their individual plan retirement accounts. To the extent requested by the plan sponsor, the Registrant will also provide participant education designed to assist participants in identifying the appropriate investment strategy for their retirement plan accounts. The terms and conditions of the engagement are set forth in a Retirement Plan Services Agreement between the Registrant and the plan sponsor.

## MISCELLANEOUS

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services**. To the extent requested by the client, Registrant may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Registrant does not serve as a law firm or accounting firm, and no portion of its services should be construed as legal or accounting services. Accordingly, Registrant does not prepare estate planning documents or tax returns. To the extent requested by a client, Registrant may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.), including representatives of Registrant in their separate individual capacities as licensed insurance agents discussed in Item 10.C. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Registrant and/or its representatives. If the client engages any recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Conflict of Interest**: The recommendation by Registrant's representative that a client purchase an insurance commission product through Registrant's representative in their separate and individual capacity as an insurance agent, presents a **conflict of interest,** as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products through such a representative. Clients are reminded that they may purchase insurance products recommended by Registrant through other, non-affiliated insurance agents or agencies.

**Non-Discretionary Service Limitations.** Clients that determine to engage Registrant on a non-discretionary basis must be willing to accept that Registrant cannot effect any account transactions without obtaining prior consent to any such transaction(s) from the client. Thus, in the event that Registrant would like to make a transaction for a client's account (including removing a security that the Registrant no longer believes is suitable, adding a security that the Registrant believes is suitable, or in the event of a market correction), and the client is unavailable, Registrant will be unable to effect the account transaction(s) (as it would for its discretionary clients) without first obtaining the client's consent. This may place certain clients at an economic disadvantage.

**Use of Mutual Funds and Exchange Traded Funds**: While the Registrant may allocate investment assets to mutual funds and exchange traded funds ("ETFs") that are not available directly to the public, the Registrant may also allocate investment assets to publicly-available mutual funds and ETFs that the client could obtain without engaging Registrant as an investment adviser. However, if a client or prospective client determines to purchase publicly-available mutual funds without engaging Registrant as an investment adviser, the client or prospective client would not receive the benefit of Registrant's initial and ongoing investment advisory services with respect to management of that asset. Other mutual funds, such as those issued by Dimensional Fund Advisors ("DFA"), are generally only available through selected registered investment advisers. Registrant may allocate client investment assets to DFA mutual funds. Therefore, upon the termination of Registrant's services to a client, restrictions regarding transferability and/or additional purchases of, or reallocation among DFA funds will apply.

**Cash Positions.** The Registrant may maintain cash and cash equivalent positions (such as money market funds) for defensive and liquidity purposes. Unless otherwise agreed in writing, all cash and cash equivalent positions will be included as part of assets under management for purposes of calculating the Registrant's investment advisory fee.

**Portfolio Activity.** Registrant has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Registrant will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when Registrant determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, there can be no assurance that investment decisions made by Registrant will be profitable or equal any specific performance level(s).

**Client Obligations**. In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify the Registrant if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Registrant's previous recommendations and/or services.

**Disclosure Statement**. A copy of the Registrant's written Brochure as set forth on Part 2 of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the applicable form of client agreement.

**Retirement Plan Rollovers – No Obligation / Conflict of Interest**. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If the Registrant recommends that a client roll over their retirement plan assets into an account to be managed by the Registrant, such a recommendation creates a conflict of interest if the Registrant will earn a new (or increase its current) advisory fee as a result of the rollover. **No client is under any obligation to roll over retirement plan assets to an account managed by**

**Registrant. The Registrant's Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client may have regarding the conflict of interest presented by such a rollover recommendation**.

C. The Registrant shall provide investment advisory services tailored to the specific needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, the Registrant shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on the Registrant's services.

D. The Registrant does not participate in a wrap fee program.

E. As of December 31, 2018, the Registrant had $299,457,628 in assets under management on a non-discretionary basis and $122,690,957 in assets under management on a discretionary basis.

## Item 5 Fees and Compensation

A. **INVESTMENT ADVISORY SERVICES**

If a client determines to engage the Registrant to provide discretionary and/or non-discretionary investment advisory services on a *fee* basis, the Registrant's non-negotiable annual investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under the Registrant's management as follows:

**Annual Fees**

| | **Account Value** | **Account Fees** | |
|---|---|---|---|
| | | **Per Quarter** | **Annualized** |
| First | $0–$500,000 | 0.25% | 1.00% of Market Value |
| Next | $500,000–$1,000,000 | 0.20% | 0.80% of Market Value |
| Next | $1,000,000–$2,000,000 | 0.125% | 0.50% of Market Value |
| Next | $2,000,000-$5,000,000 | 0.10% | 0.40% of Market Value |
| | Over $5,000,000 | 0.075% | 0.30% of Market Value |

***Fees are adjusted for individual cash inflows and outflows in excess of $5,000, during any given quarter**. Certain legacy clients may have accepted different pre-existing service offerings from Registrant and may therefore receive services under different fee schedules than as set forth above.

**FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent specifically requested by a client, the Registrant may determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. Registrant's planning and consulting fees are negotiable, but generally range from $2,000 to $6,000 on a fixed fee basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s).

**RETIREMENT PLAN CONSULTING SERVICES**

The terms and conditions of the retirement plan consulting engagement will be set forth in a Retirement Plan Services Agreement between the Registrant and the plan sponsor. The Registrant's non-negotiable advisory fee for these services is equal to 0.50% of the value of retirement plan assets.

B. Clients will have the Registrant's advisory fees deducted from their custodial account. Both Registrant's Investment Advisory Agreement and the custodial/ clearing agreement may authorize the custodian to debit the account for the amount of the Registrant's investment advisory fee and to directly remit that fee to the Registrant in compliance with regulatory procedures. The Registrant shall deduct fees quarterly in arrears, based upon the market value of the assets on the last business day of the previous quarter. Registrant uses its portfolio management system to calculate the investment advisory fees charged to clients and deducted by the account custodian(s). The values used to calculate investment advisory fees may differ from the values shown on the applicable client's custodial statement due to various account activities such as unsettled trades and accrued dividends, which may not be reflected on that client's custodial statement as of the valuation date.

C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, the Registrant shall generally recommend that Charles Schwab and Co., Inc. ("Schwab"), Fidelity Investments ("Fidelity") and/or National Advisers Trust Company ("NATC") serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab, Fidelity and NATC charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to Registrant's investment advisory fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). The fees charged by the applicable broker-dealer/custodian, and the charges imposed at the fund level, are in addition to Registrant's investment advisory fees referenced in this Item 5.

D. Registrant's annual investment advisory fee shall be prorated and paid quarterly, in arrears, based upon the market value of the assets on the last business day of the previous quarter. The applicable form of agreement between the Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of such agreement. Upon termination: a pro-rated portion of the earned but unpaid advanced advisory fee shall be due; or the Registrant will pro-rate and refund any unearned advanced advisory fees, as applicable.

E. Neither the Registrant, nor its supervised persons accept compensation from the sale of securities or other investment products.

## Item 6 Performance-Based Fees and Side-by-Side Management

Neither the Registrant nor any supervised person of the Registrant accepts performance-based fees.

## Item 7 Types of Clients

The Registrant's clients generally include individuals, high net worth individuals, pension and profit sharing plans, trusts and estates. The Registrant generally prefers to work with new clients seeking management of at least $500,000 in investment assets to provide investment advisory services. The Registrant, in its sole discretion, may charge a lesser investment advisory fee and/or waive or reduce its minimum asset requirement based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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

A. The Registrant may utilize the following methods of security analysis:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

The Registrant may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

**Please Note: Investment Risk**. Investing in securities involves risk of loss that clients should be prepared to bear, including the complete loss of principal investment. Past performance may not be indicative of future results Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Registrant) will be profitable or equal any specific performance level(s). Investment strategies such as asset allocation, diversification, or rebalancing do not assure or guarantee better performance and cannot eliminate the risk of investment losses. There is no guarantee that a portfolio employing these or any other strategy will outperform a portfolio that does not engage in such strategies. While asset values may increase and client account values could benefit as a result, it is also possible that asset values may decrease and client account values could suffer a loss.

B. The Registrant's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to the Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of the Registrant's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Registrant's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

C. Currently, Registrant recommends that certain clients allocate investment assets among various mutual funds, ETFs, and or individual debt and/or equity securities, in accordance with the client's designated investment objective(s). Each type of security has its own unique set of risks associated with it, and it would not be possible to describe the specific risks of every type of investment. However, the following provides a short description of some of the underlying risks associated with the types of investments that Registrant uses or recommends:

Market Risk. The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors (such as economic or political factors), but may also be incurred because of a security's specific underlying investments. Additionally, each security's price can fluctuate based on market movement, which may or may not be due to the security's operations or changes in its true value. For example, political, economic and social conditions may trigger market events which are temporarily negative, or temporarily positive.

Unsystematic Risk. Unsystematic risk is the company-specific or industry-specific risk in a portfolio that the investor bears. Unsystematic risk is typically addressed through diversification. However, as indicated above, diversification does not guarantee better performance and cannot eliminate the risk of investment losses.

Value Investment Risk. Value stocks may perform differently from the market as a whole and following a value-oriented investment strategy may cause a portfolio to underperform growth stocks.

Growth Investment Risk. Prices of growth stocks tend to be higher in relation to their companies' earnings and may be more sensitive to market, political and economic developments than other stocks, making their prices more volatile.

Small Company Risk. Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, small capitalization companies are more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources.

Commodity Risk. The value of commodity-linked derivative instruments may be affected by changes in overall market movements, commodity index volatility, changes in interest rates, or factors affecting a particular industry or commodity, such as drought, floods, weather, livestock disease, embargoes, tariffs, and international economic, political, and regulatory developments.

Foreign Securities and Currencies Risk. Foreign securities prices may decline or fluctuate because of: (i) economic or political actions of foreign governments, and/or (ii) less regulated or liquid securities markets. Investors holding these securities are also exposed to foreign currency risk (the possibility that foreign currency will fluctuate in value against the U.S. dollar).

Interest Rate Risk. Fixed income securities and fixed income-based securities are subject to interest rate risk because the prices of fixed income securities tend to move in the opposite direction of interest rates. When interest rates rise, fixed income security prices tend to fall. When interest rates fall, fixed income security prices tend to rise. In general, fixed income securities with longer maturities are more sensitive to these price changes.

Inflation Risk. When any type of inflation is present, a dollar at present value will not carry the same purchasing power as a dollar in the future, because that purchasing power erodes at the rate of inflation.

Reinvestment Risk. Future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate), which primarily relates to fixed income securities.

Credit Risk. The issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and impact performance. Credit risk is considered greater for fixed income securities with ratings below investment grade. Fixed income securities that are below investment grade involve higher credit risk and are considered speculative.

Call Risk. During periods of falling interest rates, a bond issuer will call or repay a higher-yielding bond before its maturity date, forcing the investment to reinvest in bonds with lower interest rates than the original obligations.

<u>Regulatory Risk</u>. Changes in laws and regulations from any government can change the market value of companies subject to such regulations. Certain industries are more susceptible to government regulation. For example, changes in zoning, tax structure or laws may impact the return on investments.

## Item 9 Disciplinary Information

The Registrant has not been the subject of any disciplinary actions.

## Item 10 Other Financial Industry Activities and Affiliations

A. Neither the Registrant, nor its supervised persons, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. Neither the Registrant, nor its supervised persons, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

C. <u>**Licensed Insurance Agents**</u>. Certain of Registrant's supervised persons are licensed insurance agents of Sterling Financial Group, Inc., t/a Sterling Advisors, an affiliated New Jersey licensed insurance agency, and in their individual capacities, may recommend the purchase of certain insurance products on a commission basis. As referenced in Item 4.B above, clients can therefore engage certain of Registrant's supervised persons to effect insurance transactions on a commission basis.

<u>**Conflict of Interest**</u>: The recommendation by Registrant's supervised persons that a client purchase an insurance commission product presents a <u>**conflict of interest**</u>, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Registrant's supervised persons. Clients are reminded that they may purchase insurance products recommended by Registrant through other, non-affiliated insurance agents. <u>**The Registrant's Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest**.</u>

<u>**Trust Company**</u>. Sterling Financial Group, Inc. (which is under common control with Registrant) has a *de minimis* shareholder interest in a savings and loan holding company, National Advisors Holding, Inc., which formed a federally chartered trust company, National Advisors Trust Company ("NATC"). NATC provides a low-cost alternative to traditional trust service providers and our firm may refer clients to NATC for trust services if it is in the best financial interest of the client. No client is required to use NATC. Any referral of clients to NATC creates a conflict of interest since it could result in an indirect increased economic benefit to said principals of the firm. However, referrals to NATC are not considered a material part of our business. <u>**The Registrant's Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest**.</u>

D. The Registrant does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

A. The Registrant maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant's overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant's supervised persons that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.

B. Neither the Registrant nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which the Registrant or any related person of Registrant has a material financial interest.

C. The Registrant and/or supervised persons of the Registrant may buy or sell securities that are also recommended to clients. This practice may create a situation where the Registrant and/or supervised persons of the Registrant are in a position to benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the Registrant's clients) and other potentially abusive practices.

In accordance with the Registrant's transaction policy, in advance of the purchase of any equity security, supervised persons must receive prior approval from the Registrant's Chief Compliance Officer, Bruce Tucker, or Ross Weiner.

The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons". The Registrant's securities transaction policy requires that the Access Person of the Registrant must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Registrant selects.

D. The Registrant and/or supervised persons of the Registrant may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or supervised persons of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11.C, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons.

## Item 12 Brokerage Practices

A. In the event that the client requests that the Registrant recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct the Registrant to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at Schwab, Fidelity and/or NATC. Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Registrant setting forth the terms and conditions under which Registrant shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

   Factors that the Registrant considers in recommending Schwab, Fidelity and/or NATC (or any other broker-dealer/custodian to clients) include historical relationship with the Registrant, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Registrant's clients shall comply with the Registrant's duty to seek best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Registrant determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Registrant's investment advisory fee. The Registrant's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

   1. <u>Non-Soft Dollar Research and Additional Benefits</u>
      Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Registrant receives from Schwab and Fidelity (and could receive from another broker-dealer/custodian, investment platform, independent investment manager, and/or product/fund sponsor) without cost (and/or at a discount) support services and/or products, certain of which assist the Registrant to better monitor and service client accounts maintained at such institutions. The support services that Registrant receives can include: investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or free consulting services, discounted and/or free travel and attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Registrant in furtherance of its investment advisory business operations. As referenced above, certain of the support services and/or products that Registrant can receive may assist the Registrant in managing and administering client accounts.

Others do not directly provide such assistance, but rather assist the Registrant to manage and further develop its business enterprise. The receipt of these support services and products presents <u>conflicts of interest</u>, because the Registrant has the incentive to recommend that clients utilize Schwab or Fidelity as a broker-dealer/custodian based upon its interest in continuing to receive the above-described support services and products, rather than based on a client's particular need. However, Registrant's clients do not pay more for investment transactions effected and/or assets maintained at Schwab or Fidelity as a result of this arrangement. There is no corresponding commitment made by the Registrant to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement. Registrant's clients do not pay more for investment transactions effected and/or assets maintained at Schwab or Fidelity as a result of these arrangements. There is no corresponding commitment made by the Registrant to Schwab, Fidelity, or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements. <u>**The Registrant's Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client may have regarding the above arrangements and conflicts of interest presented**</u>.

<u>Schwab Advisor Services</u>
Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like Registrant. Schwab Advisor Services provides Registrant and its clients with access to its institutional brokerage –trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services and additional economic benefits ("Additional Benefits"). Some of those support services and Additional Benefits help Registrant manage or administer its clients' accounts while others help Registrant manage and grow its business. As part of the Additional Benefits, Schwab may also provide monetary assistance to Registrant or to third parties on Registrant's behalf to defray certain costs towards certain technology, compliance, legal, business consulting and other related expenses. Schwab's support services are generally available on an unsolicited basis (Registrant does not have to request them) and at no charge to Registrant. <u>The availability of these services from Schwab benefits Registrant because Registrant does not have to produce or purchase them. Registrant is not required to pay for Schwab's services</u>. A more detailed description of Schwab's Additional Benefits follows.

<u>Services that Benefit the Client</u>
Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which Registrant might not otherwise have access or that would require a significantly higher minimum initial investment by Registrant's clients. Schwab's services described in this paragraph generally benefit Registrant's clients and their accounts.

<u>Services that May Not Directly Benefit the Client</u>
Schwab also makes available to Registrant other products and services that benefit Registrant but may not directly benefit Registrant's clients or their accounts. These products and services assist Registrant in managing and administering its clients'

accounts. They include investment research, both Schwab's own and that of third parties. Registrant may use this research to service all or some substantial number of its clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of Registrant's fees from Registrant's clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

<u>Services that Generally Benefit Only Registrant</u>
Schwab also offers other services intended to help Registrant manage and further develop its business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to Registrant. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide Registrant with other benefits such as occasional business entertainment of its personnel.

<u>Additional Benefits Received</u>
Registrant has and may continue to receive certain Additional Benefits that may or may not be offered to the Registrant again in the future. The Registrant most recently received a credit for one attendee at the IMPACT® 2017 Conference in Chicago, Illinois. The Registrant has no expectation that these Additional Benefits will be offered again; however, the Registrant reserves the right to negotiate for these Additional Benefits in the future. Schwab provides the Additional Benefits to Registrant in its sole discretion and at its own expense, and neither the Registrant nor its clients pay any fees to Schwab for the Additional Benefits. The Additional Benefits are generally provided on an unsolicited basis. **<u>The Registrant's Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client may have regarding the above arrangements and conflict of interest presented</u>**.

2. The Registrant does not receive referrals from broker-dealers.

3. <u>Directed Brokerage</u>. The Registrant does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Registrant will not seek better execution services or prices from other broker-dealers. As a result,

clients may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

If the client directs Registrant to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Registrant. Higher transaction costs adversely impact account performance. Higher transaction costs adversely impact account performance. **Please Note**: Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts. **The Registrant's Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client may have regarding the above arrangement**.

B. To the extent that the Registrant provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless the Registrant decides to purchase or sell the same securities for several clients at approximately the same time. The Registrant may (but is not obligated to) combine or "bunch" such orders to seek best execution, to negotiate more favorable commission rates or to allocate equitably among the Registrant's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. The Registrant shall not receive any additional compensation or remuneration as a result of such aggregation.

## Item 13 Review of Accounts

A. For those clients to whom Registrant provides investment supervisory services, account reviews are conducted on an ongoing basis by the Registrant's Principals and/or supervised persons. All investment supervisory and financial planning clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues, investment objectives and account performance with the Registrant on an annual basis, as applicable.

B. The Registrant may conduct account reviews on another than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

C. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. Those clients to whom Registrant provides investment supervisory services will also receive a quarterly report from the Registrant summarizing account activity and performance.

## Item 14 Client Referrals and Other Compensation

A. As referenced in Item 12.A.1 above, the Registrant receives economic benefits from Schwab and Fidelity including support services and/or products without cost or at a discount. Registrant's clients do not pay more for investment transactions effected and/or assets maintained at Schwab, Fidelity or any other entity as a result of these arrangements. There is no corresponding commitment made by the Registrant to Schwab, Fidelity, or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

B. Neither the Registrant nor any related person of the Registrant directly or indirectly compensates any person for client referrals.

## Item 15 Custody

The Registrant shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. Those clients to whom Registrant provides investment supervisory services will also receive a quarterly report from the Registrant summarizing account activity and performance. **<u>Please Note</u>**: To the extent that the Registrant provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by the Registrant with the account statements received from the account custodian. **<u>Please Also Note</u>**: The account custodian does not verify the accuracy of the Registrant's advisory fee calculation.

The Registrant provides other services on behalf of its clients that require disclosure at ADV Part 1, Item 9. In particular, certain clients have signed asset transfer authorizations that permit the qualified custodian to rely upon instructions from the Registrant to transfer client funds to "third parties." In accordance with the guidance provided in the SEC Staff's February 21, 2017 Investment Adviser Association No-Action Letter, the affected accounts are not subjected to an annual surprise CPA examination.

## Item 16 Investment Discretion

The client can determine to engage the Registrant to provide investment advisory services on a discretionary basis. Prior to the Registrant assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming the Registrant as the client's attorney and agent in fact, granting the Registrant full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the Registrant on a discretionary basis may, at any time, impose restrictions, **<u>in writing</u>**, on the Registrant's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Registrant's use of margin, etc.).

## Item 17 Voting Client Securities

A. The Registrant does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact the Registrant to discuss any questions they may have with a particular solicitation.

## Item 18 Financial Information

A. The Registrant does not solicit fees of more than $1,200, per client, six months or more in advance.

B. The Registrant is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

C. The Registrant has not been the subject of a bankruptcy petition.

**The Registrant's Chief Compliance Officer, Bruce Tucker, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**

**Item 1 Cover Page**

A.

# Nicholas Anthony Nicolette

Sterling Financial Planning, Inc.

ADV Part 2B, Brochure Supplement
Dated: February 27, 2019

Contact: Bruce Tucker, Chief Compliance Officer
60 Blue Heron Road, Suite 201
Sparta, New Jersey 07871
www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Nicholas Anthony Nicolette that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Nicholas Anthony Nicolette is available on the SEC's website at www.adviserinfo.sec.gov.**

**Item 2 Education Background and Business Experience**

Nicholas Anthony Nicolette was born in 1959. Mr. Nicolette graduated from Davidson College with a Bachelors degree in 1981. Mr. Nicolette has been a shareholder, Treasurer, and an Investment Adviser Representative of Sterling Financial Planning, Inc. since November of 1992. Mr. Nicolette has also served as a Shareholder and Treasurer of Sterling Financial Group, Inc. since April 1992.

Mr. Nicolette has been a CERTIFIED FINANCIAL PLANNER™ since 1984. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification.

To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. **Licensed Insurance Agent**. Mr. Nicolette, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can therefore choose to engage Mr. Nicolette to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Nicolette that a client purchase an insurance commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Nicolette. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Bruce Tucker remains available to address any questions that a client or prospective client may have regarding the above conflict of interest**.

**Item 5 Additional Compensation**

As a partial owner of the Registrant, Mr. Nicolette's compensation is based, in part, on the revenue that the Registrant generates. Accordingly, Mr. Mr. Nicolette has a conflict of interest when recommending that the Registrant provide investment advisory services, because the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

**Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.

**Item 1 Cover Page**

A.

# Bruce Robert Tucker

Sterling Financial Planning, Inc.

ADV Part 2B, Brochure Supplement
Dated: February 27, 2019

Contact: Bruce Tucker, Chief Compliance Officer
60 Blue Heron Road, Suite 201
Sparta, New Jersey 07871
www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Bruce Robert Tucker that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Bruce Robert Tucker is available on the SEC's website at www.adviserinfo.sec.gov.**

**Item 2 Education Background and Business Experience**

Bruce Robert Tucker was born in 1952. Mr. Tucker graduated from Lycoming College in 1977, with a degree in Psychology. Mr. Tucker has been a Shareholder, President, and an Investment Adviser Representative of Sterling Financial Planning, Inc. since November 1992. Mr. Tucker has also served as a Shareholder and President of Sterling Financial Group, Inc. since April 1992.

Mr. Tucker has been a CERTIFIED FINANCIAL PLANNER™ since 1991. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP®

marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification.

To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## Item 3 Disciplinary Information

None.

## Item 4 Other Business Activities

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. **Licensed Insurance Agent**. Mr. Tucker, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can therefore choose to engage Mr. Tucker to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Tucker that a client purchase an insurance commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Tucker. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Bruce Tucker remains available to address any questions that a client or prospective client may have regarding the above conflict of interest**.

## Item 5 Additional Compensation

As a partial owner of the Registrant, Mr. Tucker's compensation is based, in part, on the revenue that the Registrant generates. Accordingly, Mr. Tucker has a conflict of interest when recommending that the Registrant provide investment advisory services, because the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

## Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.

**Item 1 Cover Page**

A.

# Stephen Walter Wescott

Sterling Financial Planning, Inc.

ADV Part 2B, Brochure Supplement
Dated: February 27, 2019

Contact: Bruce Tucker, Chief Compliance Officer
60 Blue Heron Road, Suite 201
Sparta, New Jersey 07871
www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Stephen Walter Wescott that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Stephen Walter Wescott is available on the SEC's website at www.adviserinfo.sec.gov.**

## Item 2 Education Background and Business Experience

Stephen Walter Wescott was born in 1953. Mr. Wescott has taken numerous college courses and attended the College for Financial Planning. Mr. Wescott was a Shareholder and Corporate Secretary of Sterling Financial Planning, Inc. from March 1997 through January 2019. He was also a Shareholder and Corporate Secretary of Sterling Financial Group, Inc. from October 1996 through January 2019.

Mr. Wescott has been a CERTIFIED FINANCIAL PLANNER™ since 1986. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification.

To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

None.

**Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.

**Item 1 Cover Page**

A.

# Matthew Joseph Hannum

Sterling Financial Planning, Inc.

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Dated: February 27, 2019

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www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Matthew Joseph Hannum that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Matthew Joseph Hannum is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Matthew Joseph Hannum was born in 1980. Mr. Hannum graduated from Penn State University in 2002, with degrees Finance and International Business. Mr. Hannum has been a shareholder of Sterling Financial Planning, Inc. since 2011 and an Investment Adviser Representative since March 2003. He has also been employed as a Senior Associate of Sterling Financial Group, Inc. since January 2003. He has been a Shareholder and Corporate Secretary of Sterling Financial Planning, Inc. and Sterling Financial Group, Inc. since January 2019.

Mr. Hannum has been a CERTIFIED FINANCIAL PLANNER™ since 2006. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP®

marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

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To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Mr. Hannum has been a CFA® Charterholder since 2012. CFA® designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 154,000 CFA® Charterholders working in over 165 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

**High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

**Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

**Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. **Licensed Insurance Agent**. Mr. Hannum, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can therefore choose to engage Mr. Hannum to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Hannum that a client purchase an insurance commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Hannum. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Bruce Tucker remains available to address any questions that a client or prospective client may have regarding the above conflict of interest**.

**Item 5 Additional Compensation**

As a partial owner of the Registrant, Mr. Hannum's compensation is based, in part, on the revenue that the Registrant generates. Accordingly, Mr. Hannum has a conflict of interest when recommending that the Registrant provide investment advisory services, because the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

**Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.

**Item 1 Cover Page**

A.

# Deanna Iannuzzi

Sterling Financial Planning, Inc.

ADV Part 2B, Brochure Supplement
Dated: February 27, 2019

Contact: Bruce Tucker, Chief Compliance Officer
60 Blue Heron Road, Suite 201
Sparta, New Jersey 07871
www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Deanna Iannuzzi that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Deanna Iannuzzi is available on the SEC's website at www.adviserinfo.sec.gov.**

**Item 2 Education Background and Business Experience**

Deanna Iannuzzi was born in 1963. Ms. Iannuzzi attended Montclair State College from 1985-1989. Ms. Iannuzzi has been employed as an Investment Adviser Representative of Sterling Financial Planning, Inc. since March 2002 and has been employed as an Associate of Sterling Financial Group, Inc. since February 2002.

Ms. Iannuzzi has held the designation of Accredited Asset Management Specialist (AAMS®) since 2013. The AAMS® is awarded by the College for Financial Planning to investment professionals who complete its 12-module AAMS® Professional Education Program, pass an examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the AAMS® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the AAMS® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

## Item 3 Disciplinary Information

None.

## Item 4 Other Business Activities

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

## Item 5 Additional Compensation

None.

## Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.

**Item 1 Cover Page**

A.

# Sharon Madoi Nikaido

Sterling Financial Planning, Inc.

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Contact: Bruce Tucker, Chief Compliance Officer
60 Blue Heron Road, Suite 201
Sparta, New Jersey 07871
www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Sharon Madoi Nikaido that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Sharon Madoi Nikaido is available on the SEC's website at www.adviserinfo.sec.gov.**

**Item 2 Education Background and Business Experience**

Sharon Madoi Nikaido was born in 1951. Ms. Nikaido attended California State University at Northridge. Ms. Nikaido has been a Shareholder of Sterling Financial Planning, Inc. since 2006 and an Investment Adviser Representative since December 1999. She has also been employed as a Senior Associate of Sterling Financial Group, Inc. since January of 2002.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. **Licensed Insurance Agent**. Ms. Nikaido, in her individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can therefore choose to engage Ms. Nikaido to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Ms. Nikaido that a client purchase an insurance commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Ms. Nikaido. Clients are reminded that they may purchase insurance products recommended by the Registrant through other, non-affiliated insurance agents. **The Registrant's Chief Compliance Officer, Bruce Tucker remains available to address any questions that a client or prospective client may have regarding the above conflict of interest**.

**Item 5 Additional Compensation**

As a partial owner of the Registrant, Ms. Nikaido's compensation is based, in part, on the revenue that the Registrant generates. Accordingly, Ms. Nikaido has a conflict of interest when recommending that the Registrant provide investment advisory services, because the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

**Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.

**Item 1 Cover Page**

A.

# Glen Andrew Thomas

Sterling Financial Planning, Inc.

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**This Brochure Supplement provides information about Glen Andrew Thomas that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Glen Andrew Thomas is available on the SEC's website at www.adviserinfo.sec.gov.**

**Item 2 Education Background and Business Experience**

Glen Andrew Thomas was born in 1964. He graduated from Upsala College in 1987, with a degree in Business, and earned an MBA from the Rutgers Graduate School of Management in 1995. Mr. Thomas has been a Shareholder of Sterling Financial Planning, Inc. since 2006 and a Vice President of Sterling Financial Planning, Inc. since January 2019. He has also been employed as a Principal of Sterling Financial Group, Inc. since January 2016, and a Shareholder and Vice President of Sterling Financial Group, Inc. since January 2019

Mr. Thomas has been a CFA® Charterholder since 1999. CFA® designates an international professional certificate that is offered by the CFA Institute.

The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 154,000 CFA® Charterholders working in over 165 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

**High Ethical Standards**
The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients’ interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

**Global Recognition**
Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today’s quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

**Comprehensive and Current Knowledge**
The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

As a partial owner of the Registrant, Mr. Thomas' compensation is based, in part, on the revenue that the Registrant generates. Accordingly, Mr. Thomas has a conflict of interest when recommending that the Registrant provide investment advisory services, because the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

**Item 6 Supervision**

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**Item 1 Cover Page**

A.

# Ross David Weiner

Sterling Financial Planning, Inc.

ADV Part 2B, Brochure Supplement
Dated: February 27, 2019

Contact: Bruce Tucker, Chief Compliance Officer
60 Blue Heron Road, Suite 201
Sparta, New Jersey 07871
www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Ross David Weiner that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Ross David Weiner is available on the SEC's website at www.adviserinfo.sec.gov.**

**Item 2 Education Background and Business Experience**

Ross David Weiner was born in 1970. Mr. Weiner graduated from the University of Massachusetts in 1992, with a degree in Economics and received his Masters degree in Economics from the University of Massachusetts in 1996 and his PhD degree in Economics in 1999. Mr. Weiner has been employed as an Investment Adviser Representative of Sterling Financial Planning, Inc. since February 2008 and has also been employed as a Senior Associate of Sterling Financial Group, Inc. since July 2007. He has been a Shareholder of Sterling Financial Planning, Inc. since December 2018. From September 1999 to June 2007, Mr. Weiner was employed as an Assistant Professor (with tenure) at The City College of New York, Department of Economics.

Mr. Weiner has been a CERTIFIED FINANCIAL PLANNER™ since 2007. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification.

To attain the right to use the CFP® marks, an individual must currently satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning

services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

## Item 3 Disciplinary Information

None.

## Item 4 Other Business Activities

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

## Item 5 Additional Compensation

As a partial owner of the Registrant, Mr. Weiner's compensation is based, in part, on the revenue that the Registrant generates. Accordingly, Mr. Weiner has a conflict of interest when recommending that the Registrant provide investment advisory services, because the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

## Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.

**Item 1 Cover Page**

A.

# Lisa Casciaro

Sterling Financial Planning, Inc.

ADV Part 2B, Brochure Supplement
Dated: February 27, 2019

Contact: Bruce Tucker, Chief Compliance Officer
60 Blue Heron Road, Suite 201
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www.sterlingadvice.com

B.

**This Brochure Supplement provides information about Lisa Casciaro that supplements the Sterling Financial Planning, Inc. Brochure; you should have received a copy of that Brochure. Please contact Bruce Tucker, Chief Compliance Officer, if you did not receive Sterling Financial Planning, Inc.'s Brochure or if you have any questions about the contents of this Brochure Supplement.**

**Additional information about Lisa Casciaro is available on the SEC's website at www.adviserinfo.sec.gov.**

**Item 2 Education Background and Business Experience**

Lisa Casciaro was born in 1965. Ms. Casciaro graduated from St. John's University in 1987, with a Bachelor of Science degree in Accounting. Since February 2014, Ms. Casciaro has been employed as an Investment Adviser Representative of Sterling Financial Planning, Inc. She has also been employed as a Senior Associate of Sterling Financial Group, Inc. since February 2014. Ms. Casciaro has also been self employed. From January 1999 to July 2010, Ms. Casciaro was a Director of PricewaterhouseCoopers.

Ms. Casciaro has held the designation of Certified Public Accountant ("CPA") since 1995 in the State of New York and since 2006 in the State of New Jersey. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Ms. Casciaro has been a CERTIFIED FINANCIAL PLANNER™ since 2016. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification.

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 6 hours, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Item 3 Disciplinary Information**

None.

**Item 4 Other Business Activities**

A. The supervised person is not actively engaged in any other investment-related businesses or occupations.

B. The supervised person is not actively engaged in any non-investment-related business or occupation for compensation.

**Item 5 Additional Compensation**

None.

## Item 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Bruce Tucker, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons under the Act. Mr. Tucker is available at (973) 729-1234.