Wrap Program Brochure
Form ADV Appendix 1

THE STERLING GROUP

Registered Investment Advisor

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February 1, 2018

This wrap fee program brochure provides information about the qualifications and business practices of The Sterling Group. If you have any questions about the contents of this brochure, please contact us by telephone at 626-440-5995 or email at contact@tsgadvisor.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about The Sterling Group also is available on the SEC's website at www.adviserinfo.sec.gov.

Please note that the use of the term "registered investment adviser" and description of The Sterling Group and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for more information on the qualifications of our firm, our associates who advise you and our employees.

Item 2 - Material Changes

This Wrap Program Brochure is dated February 1, 2018. No material changes have been made to the Wrap Program Brochure since it was last updated on March 31, 2017.

Item 3 - Table of Contents

Item 4 - Services, Fees and Compensation

Services:

The Sterling Group is an investment advisory firm comprised of a team of professionals who oversee clients' assets and provide a range of comprehensive wealth management services. Our team has the skill and expertise to offer exceptional economic advice and market analysis, as well as a strong network of professionals to refer to for legal and tax advice, enhancing our ability to assist clients in achieving their financial goals. The Sterling Group has been helping clients in formulating and implementing complex wealth management strategies and managing their assets for over two decades.

The Sterling Group was established in 1990 and co-founded by Anita Chalmers. Ms. Chalmers led the firm for ten years before merging with the current owners, C. Hunt Salembier and Michael Hatch.

Mr. Salembier and Mr. Hatch began their careers as financial advisors at American Express Financial Advisors. In 1998 they left American Express to create their own independent wealth management firm. They subsequently merged their firm with The Sterling Group in 2000. Ms. Chalmers retired in 2008 and Mr. Hatch and Mr. Salembier remain the sole principals, each owning fifty percent of the firm.

As of December 31, 2017 The Sterling Group provides advice to client accounts with a total market value of $606,183,079 broken down as follows:

- $346,682,291 Management of client assets on a discretionary basis
- $15,593,582 Management of client assets on a non-discretionary basis
- $47,845,064 Advice with respect to LPL and/or third party managed platforms

In addition, our advisors, acting as advisors through LPL Financial LLC (LPL), also provide discretionary management services on $144,262,614 of client assets.

Our advisors also act as registered representatives of LPL Financial in the sale of securities. In this role, our advisors have provided guidance with respect to approximately $51,799,527 worth of client investments.

The Sterling Group offers a wrap program that provides investment strategies that are tailored to our client's specific needs. Management services may be provided on a discretionary or non-discretionary basis. Each portfolio is designed to meet the particular investment goal, which we determine to be suitable to the client's circumstances. We select from a wide array of investment vehicles, such as stocks, options, fixed income securities, mutual funds, real estate investment trusts, exchange traded funds, and in certain situations we may choose hedge funds, high yield debt, managed futures, and other more complex or specialized instruments. Although the selection of investments is at the discretion of the advisor, each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Once the appropriate portfolio has been determined, we monitor the investments regularly, conduct account reviews periodically and rebalance the portfolio if necessary, based upon the client's individual needs, stated goals and objectives. The Sterling Group takes a calm and measured approach to managing client's assets that is supported by the belief that over the long term, a consistent strategy that is meticulously followed will provide the best opportunity for the best return. Clients may choose to engage The Sterling Group on a non-discretionary basis. Changes in non-discretionary accounts will only be implemented with the client's authorization.

Client assets managed by The Sterling Group are held in accounts at a registered broker/dealer and qualified custodian, who will provide clearing, custody and other brokerage services for client accounts. At the present time The Sterling Group has custodial relationships with LPL Financial, LLC and Charles Schwab & Co. While The Sterling Group may assist the client in completing the custodian's paperwork, the client is ultimately responsible for providing all of the necessary information to establish the account. Clients will retain all rights of ownership in the accounts, including the right to withdraw securities and cash, vote proxies, and receive transaction confirmations.

On an accommodation basis, The Sterling Group may also agree to handle certain accounts on a non-managed basis. In such cases, The Sterling Group will not be responsible for providing management on either a discretionary or non-discretionary basis.

The Sterling Group also offers additional investment advisory services to clients. For more information about The Sterling Group's other investment advisory services, please contact your advisor for a copy of The Sterling Group Firm Brochure or go to www.adviserinfo.sec.gov.

Fees and Compensation:

Clients pay The Sterling Group a single annual advisory fee for advisory services and the execution of transactions. Clients do not pay brokerage commissions, markups or transaction charges for execution of transactions in addition to the advisory fee.

Fees are paid quarterly in advance and billed on a pro-rated annualized basis. Fees are calculated as a percentage of the market value of all assets on the last trading day of the month of the previous quarter, including cash holdings. The fee may be higher than the fee charged by other investment advisors for similar services. Our fees are generally not negotiable. Below is the schedule of fees for our asset management service:

Assets Under Management	Annual Fee Percentage:
$0 to $999,999	0.95 - 1.75%
$1,000,000 to $5,000,000	0.85 - 1.50%
$5,000,000 to $10,000,000	0.65 – 1.00%
$10,000,000 to $20,000,000	0.55 – 0.70%
Over $20,000,000	0.25 – 0.55%

The advisory fee is shared between The Sterling Group and its advisors. In such cases where a custodian other than LPL is selected by the client, The Sterling Group will pay 5% of the advisory fee received from the client to LPL as an oversight fee. This presents a conflict of interest in that The Sterling Group has a financial incentive to recommend LPL as a custodian. Notwithstanding, The Sterling Group takes its responsibility to clients seriously, and will recommend a custodian to clients only if it believes it is in the client's best interest.

In order to hire The Sterling Group to provide management services, clients will be asked to enter into a written investment advisory agreement with The Sterling Group. This agreement will set forth the terms and conditions of the relationship, including the amount of the investment advisory fee.

In the event, the advisory agreement is terminated in writing to The Sterling Group before the end of the quarterly period, clients are entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

Although clients do not pay a transaction charge in the wrap program account, clients should be aware that The Sterling Group pays the account's custodian for trading costs. With respect to accounts at held LPL and certain accounts held at Schwab, The Sterling Group pays a single asset based fee to cover the cost of transactions placed in client account. With respect to certain other accounts held at Schwab, The Sterling Group pays a transaction charge to the custodian for each transaction in the account. The transaction charges vary based on the type of transaction (e.g., mutual fund, equity or fixed income security). The decision of whether to set up the account for asset based pricing or per transaction pricing is made by The Sterling Group at the time you establish an account with the custodian. The Sterling Group attempts the select the least expensive option and considers such factors as estimated transactions per year and the estimated cost per transaction. When The Sterling Group pays transaction charges rather than an asset based fee, there is a conflict of interest. There is a financial incentive for The Sterling Group to avoid transactions in the client's account, or to place such trades less frequently. Clients should also understand that the amount of the transaction charges paid by The Sterling Group may be a factor that The Sterling Group considers when deciding which securities to select, how frequently to place transactions, and the level of advisory fee to charge the client.

Other Types of Fees and Charges:

Client accounts will incur additional fees and charges from parties other than The Sterling Group as noted below. These fees and charges are in addition to the advisory fee paid to The Sterling Group. The Sterling Group does not share in any portion of these third party fees.

The custodian and broker-dealer providing brokerage and execution services on client accounts will impose certain fees and charges. The custodian notifies clients of these charges at account opening and generally makes available a list of these fees and charges on its website. The custodian will deduct these fees and charges directly from the client's account.

Some of these fees and charges are described below:

- If a client account invests in mutual funds or ETFs, please note that as a shareholder of the fund, a management fee will apply, in addition to paying us an advisory fee for managing the assets. As many of the funds available may be purchased directly, the second layer of fees could be avoided by not using The Sterling Group's management services and by the client making their own fund investment decisions.

- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges will apply if a client transfers into or purchases such a fund in the account.

- Although only no-load and load-waived mutual funds can be purchased in a client's account, clients should understand that some mutual funds pay asset based sales charges or service fees (e.g., 12b-1 fees) to the custodian.

- If a client holds a variable annuity as part of an account, there are mortality, expense, and administrative charges. The annuity Sponsor may also impose fees for additional contract riders, and charges for excessive transfers within a calendar year.
- Certain retirement accounts - IRA and qualified retirement plan fees.

- Certain trust accounts - Administrative servicing fees for trust accounts.

- Unit investment trusts ("UIT") - creation and development fees or similar fees imposed by UIT sponsors.

- Alternative investments - Hedge fund and managed future investment management fees, managed futures investor servicing fees, and business development company fees.

- Sweep money market funds and cash balances – 12b-1 fees or other fees based on average daily deposit balances.

- Other charges required by law and imposed by the executing broker/dealer or custodian.

Further information regarding fees assessed by a mutual fund or variable annuity is available in the appropriate prospectus, which is available upon request from The Sterling Group or from the product sponsor directly.

Other Important Considerations:

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The fee may cost the client more than purchasing the program services separately. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.

- The advisory fee may also cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a commission-based brokerage account rather than a wrap fee program account.

- The Sterling Group is recommending the advisory account to the client and receives compensation as a result of the client's participation. This compensation includes the advisory fee and may also include other compensation, such as bonuses, awards or other things of value offered by our custodians to The Sterling Group or its advisors. The amount of this compensation may be more or less than what The Sterling Group would receive if the client participated in other advisory programs, programs of other investment advisors or paid separately for investment advice, brokerage and other client services. Therefore, The Sterling Group may have a financial incentive to recommend a wrap program account over other programs and services. The Sterling Group takes its responsibilities seriously and will only recommend that clients hire The Sterling Group for management services if The Sterling Group believes it is appropriate and in the client's best interests.

- Most investment products available to be purchased in the client account can be purchased by clients outside of the account, through broker-dealers or other investment firms not affiliated with The Sterling Group.

Item 5 - Types of Clients and Account Requirements

The Sterling Group provides services to Individuals, High-Net-Worth Individuals, Trusts, Estates, Charitable Organizations, Pension and Profit Sharing Plans, as well as Corporations, Limited Liability Companies and/or other types of businesses. In general, the minimum investment for new clients is $500,000 subject to a minimum annual fee of $6,250.

Item 6 - Portfolio Manager Selection and Evaluation

The Sterling Group does not select, review or recommend other investment advisors or portfolio managers to provide services in its wrap fee program. All management within a client's account is conducted by The Sterling Group and its advisors. For more information about the advisor managing the account, the client should refer to the Brochure Supplement for the advisor, which should be received along with this Wrap Program Brochure.

For client accounts where LPL Financial serves as the custodian, LPL performs certain administrative services for The Sterling Group, including generation of quarterly performance reports for client accounts. The Sterling Group relies on the accuracy of the reporting generated by LPL. Clients will receive a quarterly report, which provides performance information on a time weighted basis. The performance reports are intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices. For client accounts where Charles Schwab & Co. serves as the custodian, clients will not receive quarterly performance reports. Clients are encouraged to review periodic statements received from Charles Schwab & Co. to determine the performance of the account.

Methods of Analysis and Investment Strategies:

We are committed to helping clients achieve their financial goals and objectives. After developing a thorough understanding of a client's risk tolerance and their short and long-term goals, we work to create and implement a customized investment portfolio. To accomplish this, we utilize our investment consulting process, which is designed to help determine how best to address a client's financial goals and objectives. We examine the many factors that determine our clients' needs, such as financial situation, tax situation, income, investment time horizon and risk tolerance.

We carefully examine a client's needs and goals to ensure they are assigned an appropriate investment objective. An appropriate asset allocation is then chosen to realize a client's desired rate of return with an acceptable amount of risk. We utilize our experience to ensure client accounts are properly diversified and not subject to the volatility of a single sector, industry or asset class. We monitor our clients' managed accounts and rebalance as necessary, to ensure that they are aligned with their account objective.

When selecting mutual funds and ETFs, we examine the experience, expertise, investment philosophies, and past performance of the manager. We do this to determine if that manager has successfully demonstrated an ability to invest over a period of time and in different economic or market conditions. With mutual funds or ETFs we look at the underlying assets in an attempt to determine if there is a significant overlap in the underlying investments held in another fund in the client's portfolio.

It is important to keep in mind that there is no specific approach to investing that guarantees success or positive returns; investing in securities involves risk of loss that clients should be prepared to bear.

As stated, we generally use the following types of investments: stocks, options, fixed income securities, mutual funds (including asset allocation funds, index funds, international funds, emerging market funds, real estate

funds, high yield bond funds and funds that short the market), real estate investment trusts, exchange traded funds (including commodity funds, precious metal funds and agricultural funds), and in certain situations hedge funds, high yield debt, managed futures, and other more complex or specialized instruments may be used. The particular investments selected for a client's account will depend upon the investment objective, level of risk tolerance, sensitivity to taxes, and other factors.

There are risks associated with investing in securities. The following highlights some of the risks associated with the types of investments that may be purchased for your account:

- Investing in any security involves some level of risk; stocks, which represent equity or ownership in a company, are considered inherently risky and no return is predictable or guaranteed when investing in any stock or stock-based fund.

- Investing in international markets presents additional risks including currency fluctuations, the potential for diplomatic and political instability, regulatory and liquidity risks and foreign taxation among others. The risks of foreign investing are generally greater in emerging markets.

- High yield bonds carry greater risks than bonds rated as investment grade. For example, they are issued by organizations that do not qualify for an investment grade rating by one of the rating agencies because of the potential for higher default by the issuer. Further financial difficulties experienced by the issuer may result in a decrease in the market value of the bond, and this may make it impossible to liquidate the bond prior to maturity.

- ETFs are typically investment companies that are legally classified as open end mutual funds or UITs. However, they differ from traditional mutual funds, in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares may trade at a discount or premium to their net asset value. The difference between the bid price and the ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity, and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.

- Business development companies ("BDCs") are operated for the purpose of making investments in small and developing businesses, as well as financially troubled businesses. BDCs may also make managerial assistance available to certain companies in its portfolio. BDCs are only required to disclose net asset value on a quarterly basis. BDCs are often characterized as a publicly traded venture capital or private equity firm that is subject to certain provisions of the Investment Company Act. BDCs can be speculative investments because of the types of investments they make. These risks include, but are not limited to, portfolio company credit and investment risk, leverage risk, market and valuation risk, price volatility risk, liquidity risk, capital markets risk, interest rate risk, dependence on key personnel, and structural and regulatory risk.

- Managed futures funds, hedge funds and non-traded real estate investment trusts may be purchased within client accounts on a non-discretionary basis by clients meeting certain standards. Investing in these funds involves additional risk including, but not limited to, the risk of investment loss due to the use of leveraging and other speculative investment practices and lack of liquidity and

performance volatility. In addition, these funds are not required to provide periodic pricing or valuation information to investors and may involve complex tax structures and delays in distributing tax information. You should be aware that many of these funds are illiquid, as there is no secondary trading market available.

- Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher return to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product does not has a claim on the underlying investment, whether a security, zero coupon bond, or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

Performance Based Fees and Side-By-Side Management:

We do not charge performance based fees to clients.

Item 7 - Client Information Provided to Portfolio Managers

The Sterling Group, through its advisors, is responsible for account management; there is no separate portfolio manager involved. The Sterling Group obtains the necessary financial data from the client and assists the client in setting an appropriate investment objective for the account. This information is obtained through detailed discussions and by having the client complete a written investment advisory agreement and other documentation. Clients are encouraged to contact The Sterling Group if there have been any changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions. Clients should be aware that the investment objective selected for the account is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Clients should be aware that achievement of the stated investment objective is a long-term goal for the account.

Item 8 - Client Contact with Portfolio Managers

Clients should contact The Sterling Group at any time with questions regarding their account(s).

Item 9 – Additional Information

Disciplinary Information:

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Other Financial Industry Activities and Affiliations:

The Sterling Group is only in the business of providing investment advice as described above. However, advisors of The Sterling Group are either registered representatives of LPL Financial or AXA Advisors, LLC, both SEC registered broker/dealers and members of the Financial Industry Regulatory Authority. In this capacity the advisor can sell securities to clients and receive normal and customary compensation in the form of commissions. However, such compensation will not be received in connection with investments made in wrap fee program accounts. Clients purchasing securities from an advisor outside of a managed account will receive disclosure documents (e.g., prospectus, brokerage account agreement) when conducting such transactions.

As a result of the relationship with LPL Financial and AXA Advisors, LPL Financial and AXA Advisors may have access to certain confidential information (for example, financial information, investment objectives, transactions and holdings) about The Sterling Group's clients, even if the client does not establish any account through LPL Financial or AXA Advisors. If you would like a copy of LPL Financial's or AXA Advisors' privacy policies, please contact The Sterling Group to request copies.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading:

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high code of ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, personal securities transactions for all associates are routinely reviewed.

Furthermore, our firm has established a Code of Ethics which applies to all associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each client at all times. We have a fiduciary duty to all clients and it is this fiduciary duty that is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. It is required that all of supervised persons conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with the Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all

circumstances that might negatively affect or appear to affect the duty of complete loyalty to all clients. Our Code of Ethics was adopted pursuant to SEC rule 204A-1. This disclosure is provided to give all clients a summary of the Code of Ethics. However, if a client or a potential client wishes to review the Code of Ethics in its entirety, a copy will be provided promptly upon request.

LPL Financial's parent company, LPL Investment Holdings Inc. (ticker symbol LPLA), is a publicly traded company. AXA Advisor's parent company, AXA Group (ticker AXAHY), is a publicly traded company. The Sterling Group does not recommend or solicit orders of LPL Investment Holdings Inc. or AXA Group stock in Asset Management accounts.

Brokerage Practices:

The Sterling Group has entered into a relationship with LPL Financial and Charles Schwab & Co. to serve as custodian and executing broker/dealer for asset management accounts. In some cases, clients may choose to select another qualified custodian to execute asset management transactions. The Sterling Group requires that clients select and direct the custodian as the sole and exclusive broker/dealer to execute transactions for asset management accounts. All asset management transactions will be processed without commissions. While The Sterling Group believes that these custodians have execution procedures that are designed to obtain the best execution possible, there can be no assurance that best execution can be obtained. By selecting a particular custodian, clients may not achieve the most favorable execution.

As stated under Item 4 – Services, Fees and Compensation, in such cases where a custodian other than LPL is selected by the client, The Sterling Group will pay 5% of the advisory fee received from the client to LPL as an oversight fee. This presents a conflict of interest in that The Sterling Group has a financial incentive to recommend LPL as a custodian. Notwithstanding, The Sterling Group takes its responsibility to clients seriously, and will recommend a custodian to clients only if it believes it is in the client's best interest.

We seek to make available only custodians who will hold client assets and execute transactions on terms that we feel are most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, but not limited to the following:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody).
- Capability to execute, clear and settle trades (buy and sell securities for your account).
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.).
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds ("ETF"s), etc.).
- Availability of investment research and tools that assist in making investment decisions.
- Competitive pricing of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them.
- Reputation, financial strength and stability of the provider.
- Prior service to The Sterling Group and its clients.
- Availability of other products and services that benefit us, as discussed below.

Our firm has a non-soft-dollar arrangement with the custodians from which services are received, such as research and administrative functions, including portfolio pricing, account statement generation and fee calculations, software and other technology that provide access to client account data, and attendance at conferences, meetings and other educational and/or social events. These services are intended to support our firm in conducting business and in serving the best interests of our clients. Our firm does not receive client brokerage commissions (or markups or markdowns) in exchange for research or other products or services. Our recommendation of a qualified custodian to our clients is based on our clients' interests in receiving the best execution and the level of competitive, professional services that the qualified custodians provide.

We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm. Although such concurrent authorizations could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds, using price averaging, proration and consistently non-arbitrary methods of allocation.

The Sterling Group typically aggregates orders. The advantages to aggregating are that the orders are handled in a way that mitigates market impact (as applicable and possible) and that each client gets the same (average) execution price. We may determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades, the liquidity of the securities, and the discretionary or non-discretionary nature of the trades. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that the practice of not aggregating may cost clients more money.

Review of Accounts:

Asset management accounts are reviewed individually on a periodic basis. The nature of these reviews is to determine whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Among the factors which may trigger an off-cycle review are major market or economic events, a client's life events, requests by a client, etc. Reviews are conducted by our advisors. We provide written reports to clients as requested.

In addition to the review conducted at the account level, individual positions held in client accounts are also regularly reviewed. We monitor each investment's relative performance versus its peers and relevant benchmarks. Individual positions will be replaced, as necessary, due to performance or market conditions.

Any activity in an asset management account will be reflected on the monthly or quarterly statement from the custodian, showing account activity as well as positions held in the account at month end. Additionally, clients will receive a confirmation of each transaction that occurs, unless the transaction is the result of a systematic purchase, redemption or exchange.

Client Referrals and Other Compensation:

The Sterling Group has entered into service agreements with certain unaffiliated financial institutions (e.g., banks) that permit The Sterling Group to provide investment advisory services to the financial institution's customers. Pursuant to service agreements, The Sterling Group shares a portion of the advisory fees with the financial institutions for use of the financial institution's facilities and for access to the financial institution's customers.

As a result of our relationship with LPL Financial, we may receive production bonuses, stock options to purchase shares of LPL Financial's parent company, and other things of value such as free or reduced-cost attendance at events hosted by LPL Financial. Such compensation may be based on overall revenue produced and/or on the amount of assets serviced through LPL Financial. Thus, there is a financial incentive for us to recommend establishing an account at LPL Financial. We take our responsibilities to clients very seriously and will only recommend that clients use LPL Financial for custody and hire us for management services if we believe it is appropriate and in the client's best interests.

Custody:

We do not maintain custody of client funds or securities. All clients receive at least quarterly account statements directly from their custodian. If The Sterling Group sends account statements directly to clients, the account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm. We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The account custodian will send clients independent account statements listing account balance(s), transaction history and any fees debited from accounts.

We will not have access to client funds or securities with the exception of having advisory fees deducted from client accounts and paid to us by the custodian. Any fee deductions will be done pursuant to client's written authorization provided to the custodian.

Investment Discretion:

We accept discretionary authority over the management of client accounts. Discretionary authority is limited only to affecting trades in client accounts. We will determine the type and the amount of securities that are bought or sold without obtaining client consent for each trade. Clients must sign a discretionary investment advisory agreement with our firm for the management of an account. Clients may also elect to have us maintain accounts on a non-discretionary or non-managed basis.

Voting Client Securities:

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to the client and ask the party who sent them to mail them directly in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Financial Information:

The Sterling Group does not have any financial commitments that impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

THE STERLING GROUP

Registered Investment Advisor

Privacy Policy
March 2016

The Sterling Group considers the privacy of its clients to be of fundamental importance and has established a policy to maintain the confidentiality of the information you share with us.

In providing investment advisory services to you, we collect certain nonpublic information about you. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to you, or as permitted or required by law. This policy is applicable to information for current and former clients.

Information we collect

The personal information we collect directly from you includes information required to communicate with you and assist us in effectively addressing your financial needs. This information could include:

- Your name and address
- Your date of birth
- Investment objectives and experience
- Financial circumstances (e.g., annual income, net worth and current investments)
- Account balance and account transactions
- Social security number
- Employment information
- Trust and estate planning documents, and tax returns

We collect your personal information, for example, from the following sources:

- Information we receive from you on applications and other forms
- Information about your transactions with us or others

We also collect your personal information from others such as custodians, broker/dealers and other companies.

How information is used

All financial companies need to share client personal information to run their everyday business. We use information about you to provide our investment advisory services to you. We may disclose the information to third parties as permitted by law, including the broker/dealers, custodians or other companies used to provide services to you. From time to time, we may be required to give information about our business to regulatory authorities. This may include personal information about you. We do not sell your personal information to anyone.

How information is safeguarded

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of your information. These include confidentiality agreements with companies we hire to help us provide services to you, password-protected user access to our computer files, use of email encryption, training of employees, and strict confidentiality policies that apply to all employees.

Contact information

If you have any questions, concerns or comments about our privacy policy, you may contact us at (626)440-5995.

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Michael P. Hatch

The Sterling Group
225 S. Lake Avenue, Suite 600
Pasadena, CA 91101

(626)440-5995
www.tsgadvisor.com
February 1, 2018

This brochure supplement provides information about Mr. Hatch that supplements The Sterling Group firm brochure. You should have received a copy of that brochure. Please contact our office, if you did not receive The Sterling Group firm brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Hatch is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Michael P. Hatch, CFP®, MBA, JD, was born in 1965 in Saginaw, MI. He attended GMI Engineering & Management Institute in Flint, MI earning a BS in Business Administration; American Graduate School of International Management, Glendale, AZ earning an MBA in International Management. In 1993, he earned his Certified Financial Planner practitioner credentials through the International Board of Standards and Practices for Certified Financial Planners in Denver, CO. In 1999, he graduated with a J.D. from Southwestern University School of Law in Los Angeles, CA. He served as a financial advisor with American Express Financial Advisors, Inc. from 1989 to 1998. He is currently a registered principal with LPL Financial. He is co-operating manager, owner, and an Investment Advisor Representative ("IAR") with The Sterling Group.

CFP®:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (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 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must 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 10 hours over a two-day period, 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

I am required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of my advisory business or integrity. I have no information applicable to this item to disclose.

Item 4 - Other Business Activities

Mr. Hatch is also an Investment Advisor Representative ("IAR"), with LPL Financial. In such a capacity, he may offer advisory accounts through LPL Financial. This presents a conflict of interest to the extent that he recommends that a client open an account in which compensation is received as an IAR with LPL Financial.

Mr. Hatch is also a registered representative of LPL Financial ("LPL"), an SEC registered broker-dealer and FINRA member.

Acting as a registered representative or independent insurance agent, advisors of our firm may suggest that clients implement recommendations through their broker-dealer. If the client chooses to do so, this would present a conflict of interest to the extent that the advisory representative would receive normal and customary commissions as a registered representative or licensed insurance agent. Clients may implement and execute such transactions through an Advisor of our firm. However, clients are under no obligation to accept recommendations, or to execute transactions through our firm or their advisor's broker-dealer.

Advisory representatives and some advisory affiliates of our firm are licensed insurance agents. In such a capacity, they may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that they recommend the purchase of an insurance product which results in a commission being paid to them as insurance agents.

Item 5 - Additional Compensation

In certain circumstances, I will receive the following forms of additional compensation:

I will receive compensation from LPL Financial, one of our custodians. I may receive cash bonuses, awards of restricted stock, reimbursement of fees I pay to LPL for administrative services, and other things of value such as complimentary or reduced-cost attendance at LPL conferences or events.

I may receive compensation from product sponsors. However, such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than $100, an occasional dinner or ticket to a sporting event, or reimbursement in connections with an educational meeting or marketing initiative. Product sponsors may also pay for education or training events that I attend.

Item 6 - Supervision

My advisory services are supervised by C. Hunt Salembier, Co-Operating Manager of The Sterling Group. Among other activities, this includes review of transactions, account suitability, and written correspondence including email. Mr. Salembier can be reached at (626)440-5995.

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Anthony J. Nahra

The Sterling Group
225 S. Lake Avenue, Suite 600
Pasadena, CA 91101

(626)440-5995
www.tsgadvisor.com
February 1, 2018

This brochure supplement provides information about Mr. Nahra that supplements The Sterling Group brochure. You should have received a copy of that brochure. Please contact our office, if you did not receive The Sterling Group firm brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Nahra is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Anthony J. Nahra, CFP®, was born in 1965 in Los Angeles, CA. He earned his certificate in personal financial planning through the Metropolitan State College in Denver, CO. In 2001, he earned his Certified Financial Planner practitioner credentials through the Certified Financial Planner Board of Standards, Inc. in Denver, CO. He has worked for more than 22 years in the financial planning field, and is currently a registered representative with LPL Financial. He has been an Investment Advisor Representative ("IAR") with The Sterling Group since November 2007.

CFP®:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (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 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must 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 10 hours over a two-day period, 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

I am required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of my advisory business or integrity. I have no information applicable to this item to disclose.

Item 4 - Other Business Activities

Mr. Nahra is also an Investment Advisor Representative ("IAR"), with LPL Financial. In such a capacity, he may offer advisory accounts through LPL Financial. This presents a conflict of interest to the extent that he recommends that a client open an account in which compensation is received as an IAR with LPL Financial.

Mr. Nahra is also a registered representative of LPL Financial ("LPL"), an SEC registered broker-dealer and FINRA member.

Acting as a registered representative or independent insurance agent, advisors of our firm may suggest that clients implement recommendations through their broker-dealer. If the client chooses to do so, this would present a conflict of interest to the extent that the advisory representative would receive normal and customary commissions as a registered representative or licensed insurance agent. Clients may implement and execute such transactions through an Advisor of our firm. However, clients are under no obligation to accept recommendations, or to execute transactions through our firm or their advisor's broker-dealer.

Advisors and some advisory affiliates of our firm are licensed insurance agents through numerous insurance companies. In such a capacity, they may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that they recommend the purchase of an insurance product which results in a commission being paid to them as insurance agents.

Item 5 - Additional Compensation

In certain circumstances, I will receive the following forms of additional compensation:

I will receive compensation from LPL Financial, one of our custodians. I may receive cash bonuses, awards of restricted stock, reimbursement of fees I pay to LPL for administrative services, and other things of value such as complimentary or reduced-cost attendance at LPL conferences or events.

I may also receive compensation from product sponsors. However, such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than $100, an occasional

dinner or ticket to a sporting event, or reimbursement in connection with an educational meeting or marketing initiative. Product sponsors may also pay for education or training events that I attend.

Item 6 - Supervision

My advisory services are supervised by C. Hunt Salembier, Co-Operating Manager of The Sterling Group. Among other activities, this includes review of transactions, account suitability, and written correspondence including email. Mr. Salembier can be reached at (626)440-5995.

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Paul Poznanter

The Sterling Group
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Pasadena, CA 91101

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www.tsgadvisor.com
February 1, 2018

This brochure supplement provides information about Mr. Poznanter that supplements The Sterling Group firm brochure. You should have received a copy of that brochure. Please contact our office, if you did not receive The Sterling Group firm brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Poznanter is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Paul Poznanter was born in 1947. He attended University of California Irvine earning a BS in Biological Sciences; American Graduate School of International Management, Glendale, AZ earning a Master's degree in International Management. He has served as a registered representative of LPL Financial since 2006. He has been an Investment Advisor Representative ("IAR") with The Sterling Group since February 2018.

Item 3 - Disciplinary Information

I am required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of my advisory business or integrity. I have no information applicable to this item to disclose.

Item 4 - Other Business Activities

Mr. Poznanter is also an Investment Advisor Representative ("IAR"), with LPL Financial. In such a capacity, he may offer advisory accounts through LPL Financial. This presents a conflict of interest to the extent that he recommends that a client open an account in which compensation is received as an IAR with LPL Financial.

Mr. Poznanter is also a registered representative of LPL Financial ("LPL"), an SEC registered broker-dealer and FINRA member.

Acting as a registered representative or independent insurance agent, advisors of our firm may suggest that clients implement recommendations through their broker-dealer. If the client chooses to do so, this would present a conflict of interest to the extent that the advisory representative would receive normal and customary commissions as a registered representative or licensed insurance agent. Clients may implement and execute such transactions through an Advisor of our firm. However, clients are under no obligation to accept recommendations, or to execute transactions through our firm or their advisor's broker-dealer.

Advisory representatives and some advisory affiliates of our firm are licensed insurance agents. In such a capacity, they may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that they recommend the purchase of an insurance product which results in a commission being paid to them as insurance agents.

Item 5 - Additional Compensation

In certain circumstances, I will receive the following forms of additional compensation:

I will receive compensation from LPL Financial, one of our custodians. I may receive cash bonuses, awards of restricted stock, reimbursement of fees I pay to LPL for administrative services, and other things of value such as complimentary or reduced-cost attendance at LPL conferences or events. I may receive compensation from product sponsors. However, such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than $100, an occasional dinner or

ticket to a sporting event, or reimbursement in connections with an educational meeting or marketing initiative. Product sponsors may also pay for education or training events that I attend.

Item 6 - Supervision

My advisory services are supervised by C. Hunt Salembier, Co-Operating Manager of The Sterling Group. Among other activities, this includes review of transactions, account suitability, and written correspondence including email. Mr. Salembier can be reached at (626)440-5995.

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Charles Hunt Salembier

The Sterling Group
225 S. Lake Avenue, Suite 600
Pasadena, CA 91101

(626)440-5995
www.tsgadvisor.com
February 1, 2018

This brochure supplement provides information about Mr. Salembier that supplements The Sterling Group firm brochure. You should have received a copy of that brochure. Please contact our office, if you did not receive our The Sterling Group firm brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Salembier is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

C. Hunt Salembier, ChFC®, was born in 1967 in Darien, CT. He attended the University of Virginia in Charlottesville, VA earning a BA in Economics. He earned his Chartered Financial Consultant designation in 1996 through the American College in Bryn Mawr, PA. He served as a financial advisor with American Express Financial Advisors, Inc. from 1993 to 1998. He is currently a registered principal with LPL Financial. He is co-operating manager, owner, and an Investment Advisor Representative ("IAR") with The Sterling Group.

ChFC®:

The Chartered Financial Consultant designation (ChFC®) is awarded by the Huebner School at The American College. To receive the ChFC® designation, an individual must successfully complete courses in a selected program area, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

The following areas of study were covered under the program:

- Financial Planning: Process and Environment
- Income Taxation
- Planning for Retirement Needs
- Investments
- Fundamentals of Estate Planning
- Financial Planning Applications
- The Financial System in the Economy
- Estate Planning Applications
- Executive Compensation
- Fundamentals of Insurance Planning
- Financial Decisions for Retirement

Three years of relevant full-time business experience is also required for all Huebner School designations. The three-year period must be within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.

All ChFC®s who matriculated after June 30, 1989 are required to earn 30 hours of continuing education credit every two years:

Item 3 - Disciplinary Information

I am required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of my advisory business or integrity. I have no information applicable to this item to disclose.

Item 4 - Other Business Activities

Mr. Salembier is also an Investment Advisor Representative ("IAR"), with LPL Financial. In such a capacity, he may offer advisory accounts through LPL Financial. This presents a conflict of interest to the extent that he recommends that a client open an account in which compensation is received as an IAR with LPL Financial.

Mr. Salembier is also a registered representative of LPL Financial ("LPL"), an SEC registered broker-dealer and FINRA member.

Acting as a registered representative or independent insurance agent, advisors of our firm may suggest that clients implement recommendations through their broker-dealer. If the client chooses to do so, this would present a conflict of interest to the extent that the advisory representative would receive normal and customary commissions as a registered representative or licensed insurance agent. Clients may implement and execute such transactions through an Advisor of our firm. However, clients are under no obligation to accept recommendations, or to execute transactions through our firm or their advisor's broker-dealer.

Advisory representatives and some advisory affiliates of our firm are licensed insurance agents. In such a capacity, they may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that they recommend the purchase of an insurance product which results in a commission being paid to them as insurance agents.

Item 5 - Additional Compensation

In certain circumstances, I will receive the following forms of additional compensation:

I will receive compensation from LPL Financial, one of our custodians. I may receive cash bonuses, awards of restricted stock, reimbursement of fees I pay to LPL for administrative services, and other things of value such as complimentary or reduced-cost attendance at LPL conferences or events.

I may also receive compensation from product sponsors. However, such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than $100, an occasional dinner or ticket to a sporting event, or reimbursement in connection with an educational meeting or marketing initiative. Product sponsors may also pay for education or training events that I attend.

Item 6 - Supervision

My advisory services are supervised by Michael Hatch, Co-Operating Manager of The Sterling Group. Among other activities, this includes review of transactions, account suitability, and written correspondence including email. Mr. Hatch can be reached at (626) 440-5995.

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Mark Shuster

The Sterling Group
225 S. Lake Avenue, Suite 600
Pasadena, CA 91101

(626)440-5995
www.tsgadvisor.com
February 1, 2018

This brochure supplement provides information about Mr. Shuster that supplements The Sterling Group firm brochure. You should have received a copy of that brochure. Please contact our office, if you did not receive The Sterling Group firm brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Shuster is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Mark A. Shuster was born in 1961 in San Gabriel, CA. He attended California State University, Fresno where he graduated with a BS in Business Management. He began his career in the financial services industry in 1986. He acquired his series 6, 63, 7, and 65 licenses. Since 2001, Mr. Shuster has served as Chairman and CEO of Shuster Financial Group, LLC, located in Pasadena, CA. He has been a registered representative of AXA Advisors, LLC since September of 1999. He has been an Investment Advisor Representative ("IAR") with The Sterling Group since January 2014.

Item 3 - Disciplinary Information

I am required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of my advisory business or integrity. I have no information applicable to this item to disclose.

Item 4 - Other Business Activities

Mr. Shuster is also an Investment Adviser Representative ("IAR") of AXA Advisors, LLC. In such capacity, he may offer investment advisory and financial planning services, and may receive a set fee in connection with these services.

Mr. Shuster is principal owner of SFG Retirement Plan Consulting, LLC. He is also an Investment Adviser Representative ("IAR") of SFG Retirement Plan Consulting, LLC and KOBO Retirement Strategies, LLC, SEC registered Investment Advisors. In such capacity, he may offer investment advisory and financial planning services, and may receive a set fee in connection with these services.

Mr. Shuster is also a Registered Representative with AXA Advisors, LLC ("AXA"), a registered broker/dealer and an insurance agent with AXA Network. In these capacities, he may sell securities and insurance products, and receive commissions and other payments as a result of these transactions. The receipt of commissions or other forms of compensation creates the potential for a conflict of interest. As an example, the potential for such conflict arises when your advisor changes roles to act as a Registered Representative and/or insurance agent to earn commissions on the sale of securities and/or insurance products that you may elect to purchase in order to implement the financial planning recommendations made by Mr. Shuster while acting in the investment advisor role. Mr. Shuster is required to disclose potential and actual conflicts of interest to you.

Mr. Shuster is a licensed insurance agent and has served as CEO of Shuster Financial & Insurance Services, Inc., (SFIS) a licensed employee benefits brokerage and consulting firm since 1988. SFIS sells insurance products and receives commissions and other forms of compensation as a result of these transactions. This presents a conflict of interest to the extent that they recommend the purchase of an insurance product which results in a commission being paid to them as insurance agents.

Item 5 – Additional Compensation

In certain circumstances, I will receive the following forms of additional compensation:

I may receive compensation from product sponsors. However, such compensation may not be tied to the sale of any products. Compensation may include such items as gifts valued at less than $100, an occasional dinner or ticket to a sporting event, or reimbursement in connections with an educational meeting or marketing initiative. Product sponsors may also pay for education or training events that I attend.

Item 6 – Supervision

My advisory services are supervised by C. Hunt Salembier, Co-Operating Manager of The Sterling Group. Among other activities, this includes review of transactions, account suitability, and written correspondence including email. Mr. Salembier can be reached at (626)440-5995.