

## Item 1 Cover Page

A.

### **Timothy E. Flatley**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement  
Dated: March 7, 2016

Contact: Michelle Smaltz, Chief Compliance Officer  
1055 Westlakes Drive, Suite 150  
Berwyn, Pennsylvania 19312  
[www.sterling-advisors.com](http://www.sterling-advisors.com)

B.

**This Brochure Supplement provides information about Timothy E. Flatley that supplements the Sterling Investment Advisors, Ltd. Brochure. You should have received a copy of that Brochure. Please contact Michelle Smaltz, Chief Compliance Officer, if you did *not* receive Sterling Investment Advisors, Ltd.'s Brochure or if you have any questions about the contents of this supplement.**

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

## **Item 2 Education Background and Business Experience**

Timothy E. Flatley was born in 1959. Mr. Flatley graduated from Lebanon Valley College in 1981, Business Administration. Mr. Flatley has served as President of Sterling Investment Advisors, Ltd. since February of 2000. Mr. Flatley has also been a registered representative of Purshe Kaplan Sterling Investments since April 2011. Mr. Flatley is also an owner and registered investment adviser of IFG Russell Advisors since January 1995. From February of 2008 to March 2011 Mr. Flatley was a registered representative of Cambridge Investment Research.

Mr. Flatley has held the designation of Chartered Financial Consultant (ChFC®) since 1986. ChFC® is a financial planning designation for the insurance industry conferred by The American

College. Candidates must meet education, experience, examination, and continuing ethical requirements. Candidates must have at least three years of experience in the financial industry, or an undergraduate or graduate degree from an accredited university and two years of experience in the financial industry. Candidates are required to take nine academic courses each followed by an exam. The courses and exams cover topics in finance, investing, insurance, and estate planning.

### **Item 3 Disciplinary Information**

None.

### **Item 4 Other Business Activities**

- A. **Registered Representative of PKS** Mr. Flatley is a registered representative of Purshe Kaplan Sterling Investments (“PKS”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Flatley in his individual capacity as a registered representative of *PKS*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Flatley that a client purchase a securities commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Flatley. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
  2. **Commissions** In the event the client chooses to purchase investment products through *PKS*, brokerage commissions will be charged by *PKS* to effect securities transactions, a portion of which commissions shall be paid by *PKS* to Mr. Flatley. The brokerage commissions charged by *PKS* may be higher or lower than those charged by other broker-dealers. In addition, *PKS*, as well as Mr. Flatley, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Flatley is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.

**Other Investment Adviser Firm** The Registrant's President, Timothy Flatley, is also a shareholder and an investment adviser representative of IFG Russell Advisors, Inc. ("*IFG*"), a non-affiliated SEC registered investment advisor firm. No client is under any obligation to engage the services of *IFG*. **The Registrant's Chief Compliance Officer, Michelle Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

- B. **Licensed Insurance Agent.** Mr. Flatley is a licensed insurance agent in his individual capacity, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can therefore engage Mr. Flatley to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Flatley that a client purchase an insurance commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Flatley. 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, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

## **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 Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Michelle Smaltz, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Smaltz at (610) 560-0400.

## Item 1 Cover Page

A.

### **Sean Flatley**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March [ ], 2016

Contact: Michelle Smaltz, Chief Compliance Officer  
1055 Westlakes Drive, Suite 150  
Berwyn, Pennsylvania 19312  
[www.sterling-advisors.com](http://www.sterling-advisors.com)

B.

**This Brochure Supplement provides information about Sean Flatley that supplements the Sterling Investment Advisors, Ltd. Brochure. You should have received a copy of that Brochure. Please contact Michelle Smaltz, Chief Compliance Officer, if you did *not* receive Sterling Investment Advisors, Ltd.'s Brochure or if you have any questions about the contents of this supplement.**

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

## **Item 2 Education Background and Business Experience**

Sean Flatley was born in 1965. Mr. Flatley graduated from The Pennsylvania State University in 1985, with a degree in General Arts & Sciences. Mr. Flatley has been an investment adviser representative and Treasurer of Sterling Investment Advisors, Ltd. since May of 2000. Mr. Flatley has also been a registered representative of Purshe Kaplan Sterling Investments since April 2011. From February of 2008 to March 2011 Mr. Flatley was a registered representative of Cambridge Investment Research. From January 2000 to February 2008 Mr. Flatley was a registered representative of Walnut Street Securities, Inc. From February 2002 to June 2006 Mr. Flatley was an investment adviser representative of American Financial Management Group, Ltd.

Mr. Flatley has been a CERTIFIED FINANCIAL PLANNER™ since June 2004. 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 71,000 individuals have obtained CFP® certification in the United States.

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. **Registered Representative of PKS** Mr. Flatley is a registered representative of Purshe Kaplan Sterling Investments ("PKS"), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Flatley in his/her individual capacity as a registered representative of PKS, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Flatley that a client purchase a securities commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Flatley. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant's Chief Compliance Officer, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
  2. **Commissions** In the event the client chooses to purchase investment products through PKS, brokerage commissions will be charged by PKS to effect securities transactions, a portion of which commissions shall be paid by PKS to Mr. Flatley. The brokerage commissions charged by PKS may be higher or lower than those charged by other broker-dealers. In addition, PKS, as well as Mr. Flatley, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Flatley is separate and apart from Registrant's investment management services discussed in the Registrant's *Brochure*.
- B. **Licensed Insurance Agent**. Mr. Flatley is a licensed insurance agent in his individual capacity, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can therefore engage Mr. Flatley to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Flatley that a client purchase an insurance commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's

need. No client is under any obligation to purchase any insurance commission products from Mr. Flatley. 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, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

#### **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 Adviser's Act ("Act"). The Registrant's Chief Compliance Officer, Michelle Smaltz, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Smaltz at (610) 560-0400.

## Item 1 Cover Page

A.

### **David S. Newcomb**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March [ ], 2016

Contact: Michelle Smaltz, Chief Compliance Officer  
1055 Westlakes Drive, Suite 150  
Berwyn, Pennsylvania 19312  
[www.sterling-advisors.com](http://www.sterling-advisors.com)

B.

**This Brochure Supplement provides information about David S. Newcomb that supplements the Sterling Investment Advisors, Ltd. Brochure. You should have received a copy of that Brochure. Please contact Michelle Smaltz, Chief Compliance Officer, if you did *not* receive Sterling Investment Advisors, Ltd.'s Brochure or if you have any questions about the contents of this supplement.**

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

## **Item 2 Education Background and Business Experience**

David S. Newcomb was born in 1972. Mr. Newcomb graduated from Messiah College in 1994, with a degree in Marketing/Business Administration. Mr. Newcomb has been an investment adviser representative of Sterling Investment Advisors, Ltd. since December of 2001. Mr. Newcomb has also been a registered representative of Purshe Kaplan Sterling Investments since April 2011. From February of 2008 to March 2011 Mr. Newcomb was a registered representative of Cambridge Investment Research. From December of 2001 to February of 2008 Mr. Newcomb was a registered representative of Walnut Street Securities, Inc.

### Item 3 Disciplinary Information

None.

### Item 4 Other Business Activities

- A. **Registered Representative of PKS** Mr. Newcomb is a registered representative of Purshe Kaplan Sterling Investments (“PKS”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Newcomb in his individual capacity as a registered representative of *PKS*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Newcomb that a client purchase a securities commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Newcomb. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
  2. **Commissions** In the event the client chooses to purchase investment products through *PKS*, brokerage commissions will be charged by *PKS* to effect securities transactions, a portion of which commissions shall be paid by *PKS* to Mr. Newcomb. The brokerage commissions charged by *PKS* may be higher or lower than those charged by other broker-dealers. In addition, *PKS*, as well as Mr. Newcomb, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Newcomb is separate and apart from Registrant’s investment management services discussed in the Registrant’s *Brochure*.
- 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 Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Michelle Smaltz, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Smaltz at (610) 560-0400.

## Item 1 Cover Page

A.

**Lisa L. Curcio**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March [ ], 2016

Contact: Michelle Smaltz, Chief Compliance Officer  
1055 Westlakes Drive, Suite 150  
Berwyn, Pennsylvania 19312  
[www.sterling-advisors.com](http://www.sterling-advisors.com)

B.

**This Brochure Supplement provides information about Lisa L. Curcio that supplements the Sterling Investment Advisors, Ltd. Brochure. You should have received a copy of that Brochure. Please contact Michelle Smaltz, Chief Compliance Officer, if you did *not* receive Sterling Investment Advisors, Ltd.'s Brochure or if you have any questions about the contents of this supplement.**

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

## Item 2 Education Background and Business Experience

Lisa L. Curcio was born in 1956. Ms. Curcio graduated from The Philadelphia College of Art in 1981, with a degree in BFA Fine Arts. Ms. Curcio has been an investment adviser representative of Sterling Investment Advisors, Ltd. since June of 2007. Ms. Curcio has also been a registered representative of Purshe Kaplan Sterling Investments since April 2011. From February 2008 to March 2011 Ms. Curcio was a registered representative of Cambridge Investment Research. From October 2006 to June 2007 Ms. Curcio was a client associate of Merrill Lynch, Pierce, Fenner & Smith Inc. From February 2005 to June 2006 Ms. Curcio was a senior client service associate of Managers Investment Group LLC.

### Item 3 Disciplinary Information

None.

### Item 4 Other Business Activities

- A. **Registered Representative of PKS** Ms. Curcio is a registered representative of Purshe Kaplan Sterling Investments (“PKS”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Ms. Curcio in her individual capacity as a registered representative of *PKS*, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Ms. Curcio that a client purchase a securities commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Ms. Curcio. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
  2. **Commissions** In the event the client chooses to purchase investment products through *PKS*, brokerage commissions will be charged by *PKS* to effect securities transactions, a portion of which commissions shall be paid by *PKS* to Ms. Curcio. The brokerage commissions charged by *PKS* may be higher or lower than those charged by other broker-dealers. In addition, *PKS*, as well as Ms. Curcio, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Ms. Curcio is separate and apart from Registrant’s investment management services discussed in the Registrant’s Brochure.
- 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**

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## Item 1 Cover Page

A.

### **Matthew Croley**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March [ ], 2016

Contact: Michelle Smaltz, Chief Compliance Officer  
1055 Westlakes Drive, Suite 150  
Berwyn, Pennsylvania 19312  
[www.sterling-advisors.com](http://www.sterling-advisors.com)

B.

**This Brochure Supplement provides information about Matthew Croley that supplements the Sterling Investment Advisors, Ltd. Brochure. You should have received a copy of that Brochure. Please contact Michelle Smaltz, Chief Compliance Officer, if you did *not* receive Sterling Investment Advisors, Ltd.'s Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Matthew Croley 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 Croley was born in 1976. Mr. Croley graduated from The Pennsylvania State University in 1998, with a degree in Insurance. Mr. Croley has been Director of Operations of Sterling Investment Advisors, Ltd. since February 2007. Mr. Croley has also been of Purshe Kaplan Sterling Investments since April 2011. From February of 2008 to March 2011 Mr. Croley was a registered representative of Cambridge Investment Research. From June 2000 to February 2007 Mr. Croley was Director of Operations of Preswick Capital Management, LLC

## Item 3 Disciplinary Information

None.

#### Item 4 Other Business Activities

- A. **Registered Representative of PKS** Mr. Croley is a registered representative of Purshe Kaplan Sterling Investments (“PKS”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Croley in his/her individual capacity as a registered representative of PKS, to implement investment recommendations on a commission basis.
1. **Conflict of Interest** The recommendation by Mr. Croley that a client purchase a securities commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any commission products from Mr. Croley. Clients are reminded that they may purchase investment products recommended by Registrant through other, non-affiliated broker dealers. **The Registrant’s Chief Compliance Officer, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**
  2. **Commissions** In the event the client chooses to purchase investment products through PKS, brokerage commissions will be charged by PKS to effect securities transactions, a portion of which commissions shall be paid by PKS to Mr. Croley. The brokerage commissions charged by PKS may be higher or lower than those charged by other broker-dealers. In addition, PKS, as well as Mr. Croley, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Croley is separate and apart from Registrant’s investment management services discussed in the Registrant’s Brochure.
- B. **Licensed Insurance Agent**. Mr. Croley, 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 engage Mr. Croley to purchase insurance products on a commission basis. **Conflict of Interest**: The recommendation by Mr. Croley that a client purchase an insurance commission product presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client’s need. No client is under any obligation to purchase any insurance commission products from Mr. Croley. 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, Ms. Smaltz, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

#### Item 5 Additional Compensation

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## **Item 6 Supervision**

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**Item 1 Cover Page**

A.

**Paul C. McClatchy, Jr.**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March [ ], 2016

Contact: Michelle Smaltz, Chief Compliance Officer  
1055 Westlakes Drive, Suite 150  
Berwyn, Pennsylvania 19312  
www.sterling-advisors.com

B.

**This Brochure Supplement provides information about Paul C. McClatchy, Jr. that supplements the Sterling Investment Advisors, Ltd. Brochure. You should have received a copy of that Brochure. Please contact Michelle Smaltz, Chief Compliance Officer, if you did *not* receive Sterling Investment Advisors, Ltd.'s Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Paul C. McClatchy, Jr. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 Education Background and Business Experience**

Paul C. McClatchy, Jr. was born in 1965. Mr. McClatchy graduated from Furman University in 1988, with a Bachelor of Arts degree in Business Administration and from St. Joseph's University in 2013, with a Masters of Business Administration degree. Mr. McClatchy has served as a Vice President of Sterling Investment Advisors, Ltd. since December of 2013. From April 1989 to July 2005 Mr. McClatchy was employed as a registered representative of The Vanguard Group of Investments. From July 2005 to August 2013 Mr. McClatchy worked as the Vice President of Financial Planning for eMoney Advisor, LLC.

Mr. McClatchy has been a CERTIFIED FINANCIAL PLANNER™ since 1999. 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 71,000 individuals have obtained CFP® certification in the United States.

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- 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 Adviser's Act ("*Act*"). The Registrant's Chief Compliance Officer, Michelle Smaltz, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Ms. Smaltz at (610) 560-0400.