

## Item 1 Cover Page

A.

### **Timothy E. Flatley**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March 29, 2023

Contact: Catherine Whetstone, 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 Catherine Whetstone, 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 was also an owner and registered investment adviser of IFG Russell Advisors from January 1995 to October 2017. 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. The ChFC® designation has been a mark of excellence for forty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn

the ChFC<sup>®</sup> exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC<sup>®</sup> designees must meet experience requirements and adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

### 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, Catherine Whetstone, 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, in his individual capacity, is a licensed insurance agent and may recommend the purchase of certain insurance-related products on a commission basis. Clients can therefore 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 **material 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, Catherine Whetstone, 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 Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Catherine Whetstone, 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 promoter 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. Whetstone at (610) 560-0400.

## Item 1 Cover Page

A.

### Sean Flatley

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March 29, 2023

Contact: Catherine Whetstone, 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 Catherine Whetstone, 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 1987, 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 is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

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

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

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

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Flatley is also an Accredited Investment Fiduciary® (AIF®) Designee. The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their

application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

### 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, Catherine Whetstone, 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, in his individual capacity, is a licensed insurance agent and may recommend the purchase of certain insurance-related products on a

commission basis. Clients can therefore 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, Catherine Whetstone, 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 Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Catherine Whetstone, 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 promoter 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. Whetstone at (610) 560-0400.

## Item 1 Cover Page

A.

### **David S. Newcomb**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March 29, 2023

Contact: Catherine Whetstone, 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 Catherine Whetstone, 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, Catherine Whetstone, 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 Advisers Act of 1940 (the “Act”). The Registrant’s Chief Compliance Officer, Catherine Whetstone, 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 promoter 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. Whetstone at (610) 560-0400.

## Item 1 Cover Page

A.

### **Lisa L. Curcio**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March 29, 2023

Contact: Catherine Whetstone, 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 Catherine Whetstone, 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. Ms. Curcio worked for Rittenhouse Financial/Nuveen Investments for twelve years prior to heading up the Private Client Group.

Ms. Curcio is an Accredited Investment Fiduciary<sup>®</sup> (AIF<sup>®</sup>) Designee. The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

### 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, Catherine Whetstone, 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**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Catherine Whetstone, 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 promoter 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. Whetstone at (610) 560-0400.

## Item 1 Cover Page

A.

### **Matthew Croley**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March 29, 2023

Contact: Catherine Whetstone, 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 Catherine Whetstone, 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, Catherine Whetstone, 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, Catherine Whetstone, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

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## Item 1 Cover Page

A.

### **Bray Hansel**

Sterling Investment Advisors, Ltd.

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Dated: March 29, 2023

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1055 Westlakes Drive, Suite 150  
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**Additional information about Bray Hansel is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

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

Bray Hansel was born in 1988. Mr. Hansel graduated from the University of Pittsburgh in 2011, with a Bachelor of Science degree in Finance. Mr. Hansel has been a financial advisor of Sterling Investment Advisors, Ltd. since January 2017. From January 2016 to December 2016, Mr. Hansel was a financial analyst with Radnor Financial Advisors. From May 2011 to January 2016, Mr. Hansel was a financial analyst with The Vanguard Group.

Mr. Hansel is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold

the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

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- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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

Mr. Hansel has held the designation of Chartered Financial Consultant (ChFC®) since 2020. The ChFC® designation has been a mark of excellence for forty years and currently requires nine college-level courses, the most of any financial planning credential. Average study time to earn the ChFC® exceeds 450 hours. Required courses cover extensive education and application training in financial planning, income taxation, investments, and estate and retirement planning. Additional electives are chosen from such topics as macroeconomics, financial decisions for retirement, and executive compensation. ChFC® designees must meet experience requirements and

adhere to continuing education and ethical standards. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation.

### **Item 3 Disciplinary Information**

None.

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

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

### **Item 5 Additional Compensation**

None.

### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Catherine Whetstone, 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 promoter 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. Whetstone at (610) 560-0400.

## Item 1 Cover Page

A.

### **Gabriel M. Fairorth**

Sterling Investment Advisors, Ltd.

ADV Part 2B, Brochure Supplement

Dated: March 29, 2023

Contact: Catherine Whetstone, 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 Gabriel M. Fairorth that supplements the Sterling Investment Advisors, Ltd. Brochure. You should have received a copy of that Brochure. Please contact Catherine Whetstone, 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 Gabriel M. Fairorth is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Education Background and Business Experience

Gabriel M. Fairorth was born in 1998. Mr. Fairorth graduated from St. Charles Borromeo Seminary in 2021 with a Bachelor of Arts degree in Philosophy. Mr. Fairorth has been a financial analyst of Sterling Investment Advisors, Ltd. since October of 2021. Prior to that he was a student.

## 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. Mr. Fairorth is a course employee at Waynesborough Country Club, a golf club, and spends approximately 20 hours per month on this activity.

#### **Item 5 Additional Compensation**

None.

#### **Item 6 Supervision**

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). The Registrant's Chief Compliance Officer, Catherine Whetstone, 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 promoter 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. Whetstone at (610) 560-0400.