

### Introduction

The Sterling Group (referred to as “we” or “us”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### What investment services and advice can you provide me?

We offer investment advisory services to retail investors. These services include a Wrap Fee Asset Management Program, a Non-Wrap Asset Management Program, a Technology-Enhanced Asset Management Program, and advisory programs offered by third-party asset managers. In addition to these asset management programs, we provide fixed fee financial planning services as well as hourly financial consulting services. When providing investment management services, we strive to understand your financial situation, goals, objectives and risk tolerance. We use the following investment types: exchange traded funds (ETFs), mutual funds, stocks, bonds, options, and real estate investment trusts, among others. We monitor most investments on a monthly basis, and we review your account at least twice annually. We will review your account more frequently upon request. For financial planning and certain limited-scope advisory relationships, we do not provide ongoing monitoring. We manage accounts on a discretionary or non-discretionary basis. If you select discretionary, we will buy or sell securities in your account when we determine it is appropriate or necessary. For discretionary accounts, we will not consult with you prior to trading. If you select non-discretionary, you make the ultimate decision regarding the purchase and sale of securities. You will specify the trading authority in our advisory agreement, and these instructions will remain in place until the agreement is terminated. While exceptions are made, we typically require a \$1,000,000 minimum investment per household when establishing a new relationship.

*Additional information about our investment advisory services is available in our [Form ADV Part 2A - Firm Brochure](#) (see Items 4 and 7) and in our [Form ADV Part 2A, Appendix 1 - Wrap Program Brochure](#) (see Items 4 and 5). If you are viewing a paper version of this form, please visit [tsgadvisor.com/CRS](https://www.tsgadvisor.com/CRS) for hyperlinks to these documents.*

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including licenses, education and other qualifications? What do these qualifications mean?

### What fees will I pay?

We typically charge an asset-based advisory fee that is a percentage of your account, including cash holdings. We charge advisory fees quarterly, in advance, and you pay this fee regardless of whether there are transactions in your account. We have an incentive to increase the value of your account over time, which will increase our fees. For financial planning services we charge a flat fee that is quoted when you engage our services. We charge an hourly fee for financial consulting services.

Most of our client accounts are administered under our Wrap Fee Asset Management Program. Under this program, you do not pay any transaction charges for trading that takes place in your account. We will pay your custodian for trading costs, through either an asset-based fee or a transaction charge. To the extent your custodian charges us for transactions, this creates a conflict of interest and financial incentive for us to avoid transactions in your account or to place trades less frequently. We will consider these transaction charges when we determine the level of your advisory fee. Under our Non-Wrap Asset Management Program, you are responsible for paying your custodian for any transaction charges. These transaction charges are in addition to our advisory fee. If we engage in frequent trading, you will pay more in transaction charges increasing the overall cost of your account management. This will negatively impact your account performance.

If applicable to your account, you will also incur charges imposed by the custodian or another third-party including, but not limited to: custodian fees; retirement account maintenance fees; fees related to mutual funds and exchange-traded funds; and other transactional fees and product-level fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Additional information about fees and expenses, including fee schedules, is available in our [Form ADV Part 2A - Firm Brochure](#) (see Item 5) or our [Form ADV Part 2A, Appendix 1 - Wrap Program Brochure](#) (see Item 4). If you are viewing a paper version of this form, please visit [tsgadvisor.com/CRS](http://tsgadvisor.com/CRS) for hyperlinks to these documents.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

A conflict of interest exists for individuals that currently invest in an employer-sponsored retirement plan or IRA and are considering a transfer of assets from the retirement plan or IRA to The Sterling Group. This conflict exists because we will only be compensated if you transfer the proceeds into an IRA that we manage. Therefore, we have a financial incentive to recommend one option over another.

Our financial professionals are registered representatives of a broker-dealer. Separate from investment advice through The Sterling Group, these financial professionals may offer securities and receive commissions when placing securities transactions. This is a conflict of interest if the financial professional recommends that you invest in a security which results in a commission being paid to the professional.

Additional information about our conflicts of interest is available in our [Form ADV Part 2A Firm Brochure](#) or [Form ADV Part 2A Appendix 1 Wrap Program Brochure](#). If you are viewing a paper version of this form, please visit [tsgadvisor.com/CRS](http://tsgadvisor.com/CRS) for hyperlinks to these documents.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- How might your conflicts of interest affect me, and how will you address them?

**How do your financial professionals make money?**

Our revenue is derived from the advisory fees we collect. Our professionals are paid a salary for servicing client accounts as well as a portion of the advisory fees that we collect for the accounts that they service. Our professionals may also receive non-cash compensation from our custodians and some product sponsors. They may receive gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement for educational meetings or marketing or advertising initiatives.

**Do you or your financial professionals have legal or disciplinary history?**

No. You may visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- As a financial professional, do you have any disciplinary history? For what type of conduct?

**Additional information**

You can find additional information about our investment advisory services on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching our CRD # 111782. You may also contact our firm at (626)-440-5995.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?