

# FORM CRS – CLIENT RELATIONSHIP SUMMARY STERLING FINANCIAL GROUP, INC.

November 2023

Sterling Financial Group, Inc. ("SFG," "Firm," "we," "our," or "us") is an investment advisory firm registered with the Securities and Exchange Commission ("SEC"). Fees for brokerage and investment advisory services differ and it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at <a href="https://www.Investor.gov/CRS">www.Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing.

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

For retail clients, we provide investment advisory services that include written financial planning, financial consulting, asset management, and third-party portfolio management services.

Written financial planning and financial consulting services are provided on a non-discretionary basis. Non-discretionary means we provide recommendations to you, and you make the ultimate decision of whether or not to implement the recommendation, including the purchase or

## Ask one of our financial professionals the following questions:

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 your licenses, education, and other qualifications? What do these qualifications mean?

sale of investments. Our written financial planning services can cover a single issue or be comprehensive, and recommendations are meant to illustrate various strategies. After the completion of our analysis, we customarily provide clients with a written summary of their financial situation, our observations, and recommendations. The financial consulting process is less formal than our written financial planning service and is generally offered when a client's need for financial consulting advice is anticipated for an extended period of time. Some financial consulting engagements result in providing the client with a written summary of our observations and recommendations, while other engagements involve our participation in meetings, conference calls and negotiations which will not result in a written summary. We offer financial consulting and expert advice in all the same areas in which we conduct financial planning. Clients can accept or reject at any time some or all recommendations made by SFG.

Asset management services are offered on a discretionary and non-discretionary basis through a wrap fee program sponsored and managed by SFG. Discretionary authority allows us to decide the type and amount of securities to be bought or sold for your account and when to invest, without consulting you first. We maintain this discretion until it is revoked (e.g., by termination of our agreement or upon written instruction from you). A wrap fee program is a program in which you will pay a single annual advisory fee for asset management services and the execution of transactions within the wrap program. Third-party portfolio management services are offered on a discretionary basis. These services will be provided through third-party investment advisers directly or as part of a program sponsored by one of our custodian partners. For our asset management services, we create, based on your objectives, needs, guidelines, risk tolerance, and other information you provide, a tailored portfolio management solution and target asset allocation. We typically use stocks, options, fixed income securities, mutual funds, real estate investment trusts, exchange traded funds, and in certain situations we can choose hedge funds, high yield debt, managed futures and other more complex or specialized instruments. For third-party portfolio management services, we use a broad range of Portfolio Managers that use numerous investment styles including equity, fixed income, balanced, international, ETF, REIT, and socially responsible portfolios.

We review asset management and portfolio management accounts on an ongoing basis, with each account reviewed at least annually. We also perform a review when there is a change to your financial situation, a need to rebalance to maintain the asset class integrity of your account, or a change in a fund or security used to represent an asset class. We generally require a minimum account value of \$500,000. Please see below for more information on fees. For further information about our services and advice please read Items 4, 7, and 8 of our Form ADV Part 2A disclosure brochure and Items 4 and 6 of our Form ADV Part 2A Appendix Wrap Fee Brochure. Please contact us at (626) 440-9192 to request a copy of the Form ADV Part 2A or go to purpose adviserinfo.sec.gov.

#### What fees will I pay?

For asset management services in our wrap program, we charge an annual investment management fee paid quarterly in advance and billed on a pro-rated annualized basis. Wrap program fees include SFG's asset management fee and transaction fees. Fees are calculated as a percentage of the market value of all assets under management on the last trading day of the month of the previous calendar quarter, including cash holdings. Assets deposited or withdrawn between billing cycles will be assessed an investment advisory fee based only upon the number of days the assets are in the account. For

## Ask one of our financial professionals the following questions:

Help me understand how these fees and costs might affect my investments. If I give you \$500,000 to invest, how much will go to fees and costs, and how much will be invested for me?

accounts up to \$999,999 in AUM, the fee is 0.85 - 1.75%; for accounts over \$1M up to \$5M, the fee is 0.75 - 1.50%; between \$5M and \$10M, 0.55 - 1.00%; between \$10M and \$20M, 0.45 - 0.75%; and accounts with a value over \$20M pay 0.20 - 0.50% of AUM annually. We will consider all accounts which constitute a "household" together—typically any spouse, parent, child, partner, or sibling who shares a residence with you. Our minimum investment management fee is generally \$6,250 per year; however, we can, in our sole discretion, waive the minimum fee in limited circumstances, such as the referral of a family member or professional referrals. Our fees are generally not negotiable, but we reserve the right to reduce or waive any fees for certain clients, friends, and family at our sole discretion. For third-party portfolio management

services, fees will include the fee above as well as advisory fees charged by the chosen portfolio manager, custody, and clearing fees charged by the account custodian and/or program sponsor. You should refer to the disclosure brochure for the portfolio manager and/or advisory platform, related advisory agreements, and account opening paperwork for more information regarding the fees and compensation. For written financial planning services, we typically charge a flat fee between \$2,500 and \$12,500, depending on the type, scope, and complexity of services. For financial consulting services, we typically charge an hourly fee between \$50 and \$350.

Because we charge an asset-based fee, the more assets that are in your advisory account, the more you will pay in fees. This presents a conflict of interest because the firm has an incentive to encourage you to increase the assets in your account. You will also pay additional fees to third parties in connection with your managed account. These can include (as applicable), transaction costs, retirement plan administration fees, deferred sales charges on mutual funds, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and others. 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. More detailed information about our fees and other costs associated with investing, along with applicable conflicts can be found in Items 5, 10, 11 and 14 of our Form ADV Part 2A disclosure brochure and Items 4 and 9 of our Form ADV Part 2A Appendix Wrap Fee Brochure. Please contact us at (626) 440-9192 to request a copy of the Form ADV Part 2A or go to www.adviserinfo.sec.gov.

### 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?

## Ask one of our financial professionals the following questions:

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

When we act as your investment adviser, we must 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. More detailed information about our conflicts of interest can be found in Items 4, 10, 11, 12, and 14 of our Form ADV Part 2A disclosure brochure Items 9 of our Form ADV Part 2A Appendix Wrap Fee Brochure. Please contact us at (626) 440-

9192 to request a copy of the Form ADV Part 2A or go to www.adviserinfo.sec.gov.

### How do your financial professionals make money?

Each SFG financial professional is paid a salary and a discretionary bonus. Neither the salary nor bonus is based on or tied to the number of clients that have been referred to us or the types of investment products we recommend to clients. Michael Hatch is the majority owner of SFG in addition to his role as an investment advisor. The owners of SFG participate in the profits and losses of the Firm. Additional information about the compensation received by SFG professionals and any related conflicts of interest are outlined in each professional's Form ADV Part 2B, which can be obtained by calling us at (626) 440-9192.

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

Yes. Please go to <a href="www.Investor.gov/CRS">www.Investor.gov/CRS</a> for a free and simple search tool to research us and our financial professionals.

# Ask one of our financial professionals the following questions:

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

## Ask one of our financial professionals the following questions:

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

#### Additional Information

You can obtain additional information and/or request a copy of this Form CRS by going to <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a> or by calling us at (626) 440-9192.