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FORM ADV PART 2B
Individual Disclosure Brochure
FOR
Scott D. Gardner (CRD #6720246)

This brochure supplement provides information about Scott Duane Gardner that supplements the Sterling Wealth Management brochure. You should have received a copy of that brochure. Please contact Scott Duane Gardner if you did not receive Sterling Wealth Management's brochure or if you have any questions about the contents of this supplement.

If you have any questions about the contents of this brochure, please contact us at (702) 228-0500 or by email at service@sterlingwealth.net. Additional information about Sterling Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov.

Our CRD number is 283916.

This brochure was last updated on February 20, 2025.

» ITEM 2: Educational Background and Business Experience

A. EDUCATIONAL BACKGROUND

Mr. Gardner is a high school graduate who received no higher education degrees or certificates after high school.

Mr. Gardner's professional career began at American Express, where he spent five years in their international Travelers Cheque, accounting, and risk management divisions.

In 2005, Mr. Gardner moved to Las Vegas, where he partnered with his father in two business ventures—a real estate company and a business services company.

Mr. Gardner has real estate broker, property management, and business broker professional licenses.

After obtaining his Series 65 securities license in 2017, Mr. Gardner formally registered Sterling Wealth Management LLC with the Nevada Securities Division.

B. TYPE OF ADVISORY SERVICES

SWM offers advisory services and financial planning services to individuals and institutions.

Advisory Services

SWM offers portfolio management services based on each client's goals, objectives, time horizon, and risk tolerance. SWM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels).

Portfolio management services include but are not limited to investment strategy, asset

allocation, risk tolerance, personal investment policy, asset selection, and portfolio monitoring.

SWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SWM will request discretionary authority from clients to select securities and execute transactions without additional permission from the client before each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

SWM seeks to provide investment decisions that are made in accordance with the fiduciary duties owed to its clients and without consideration of SWM's economic, investment, or other financial interests.

To meet its fiduciary obligations, SWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios. Accordingly, SWM's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time.

It is also SWM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply among its clients on a fair and equitable basis over time.

Financial Planning

Financial plans and financial planning may include but are not limited to investment planning, life insurance, tax concerns, retirement planning, college planning, and debt/credit planning.

Services Limited to Specific Types of Investments

SWM generally limits its investment advice to mutual funds, fixed income securities, real estate, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation-linked bonds, commodities, non-U.S. securities, venture capital funds, and private placements, although SWM primarily recommends U.S. equities.

SWM may also use other securities to help diversify a portfolio when applicable.

» **ITEM 3: Disciplinary Information**

The State of Nevada, Securities Division issued an Administrative Consent Order on July 30, 2018 to SWM and Mr. Gardner due to the fact that SWM's management person: Mr. Gardner had no prior experience as a representative of an investment advisor and has such limited his licensing to require a supervisory period.

On July 20, 2020, this Order was withdrawn, and the supervisory period was terminated through the issuance of a further Administrative Consent Order dated July 20, 2020. Under the new Order, SWM will submit a full, independent review of SWM's policies and procedures and a detailed statement on steps it has taken to remove itself from taking custody of client funds. No further enforcement action would be taken, and the Division closed its administrative investigation, which was pursuant to the first Order.

» **ITEM 4: Other Business Activities**

Sterling Real Estate

Mr. Gardner maintains an active real estate brokers license through the state of Nevada. His company, Sterling Commercial, LLC dba Sterling Real Estate, provides real estate services. From time to time, he may offer clients advice or products from this business. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Sterling Wealth Management always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Sterling Wealth Management Clients are in no way required to buy or sell their real estate through this company. This outside activity takes approximately 5 hours per week of Mr. Gardner's time.

Nevada Management Services

Mr. Gardner is the owner of Nevada Management Services LLC, which provides bookkeeping, record management, and business back-end support services. From time to time, he may offer clients advice or products from those activities, and clients should be aware that these services may involve a conflict of interest. Sterling Wealth Management always acts in the best interest of the client, and clients always have the right to decide whether or not to utilize the services of any Sterling Wealth Management affiliate in such an individual's outside capacities. This outside activity takes approximately 8 hours per week of Mr. Gardner's time.

» ITEM 5: Additional Compensation

Mr. Gardner does not receive any economic benefit from any person, company, or organization other than Sterling Wealth Management in exchange for providing clients advisory services.

» ITEM 6: Supervision

As the Chief Compliance Officer of Sterling Wealth Management, Mr. Gardner supervises all activities of the firm.

Mr. Gardner adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

Mr. Gardner's contact information is on the cover page of this disclosure document.

» ITEM 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

A. MR. GARDNER **HAS NOT** BEEN INVOLVED IN ANY OF THE EVENTS LISTED BELOW:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c)

theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.
3. Personal or business bankruptcy.