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

This brochure supplement provides additional information about Scott D. Gardner and complements 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 18, 2026**.

► ITEM 2: Educational Background and Business Experience

A. EDUCATIONAL BACKGROUND

Mr. Gardner attended college following high school but did not complete a degree program.

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 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 that outlines the client's current situation (income, tax levels, and risk tolerance).

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 each client's current investments in light of their risk tolerance and time horizon. SWM will request discretionary authority from clients to select securities and execute transactions without additional client permission 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 appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that may have limited supply, to 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 because SWM's management person, Scott D. Gardner, had no prior experience as a representative of an investment adviser and had 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 broker's 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 commissions and may involve a potential 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 advisory services to clients of Sterling Wealth Management.

► 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 and 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.

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

3. Personal or business bankruptcy.

► 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