

Firm Brochure

(Part 2A of Form ADV)

STERLING FINANCIAL SERVICES, LLC

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This brochure provides information about the qualifications and business practices of STERLING FINANCIAL SERVICES, LLC. If you have any questions about the contents of this brochure, please contact us at: 603-224-1010 or email JAMES.KNEE@STERLINGFINANCIAL.CO.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about STERLING FINANCIAL SERVICES, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

MARCH 15, 2012

Sterling Financial Services

Material Changes

Annual Update: March 15, 2012

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update: March 11, 2011

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 603-224-1010 or by emailing JAMES.KNEE@STERLINGFINANCIAL.CO.

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Advisory Business

Firm Description

STERLING FINANCIAL SERVICES, LLC, ("FIRM") was founded by James E. Knee in 1998. STERLING FINANCIAL SERVICES, LLC provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

STERLING FINANCIAL SERVICES, LLC is in the business of selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. STERLING FINANCIAL SERVICES, LLC receives some economic benefit i.e. commissions for brokerage clients.

Investment advice is an integral part of financial planning. In addition, STERLING FINANCIAL SERVICES, LLC advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning. Investment advice is provided, with the client making the final decision on investment selection. STERLING FINANCIAL SERVICES, LLC does not act as a custodian of client assets. The client always maintains asset control. STERLING FINANCIAL SERVICES, LLC places trades for clients under a limited power of attorney or trade authorization, which pertains to the purchase or sale of securities. A written evaluation of each client's initial situation is provided to the client, often in the form of a consolidated holdings report, portfolio snapshot and Morningstar portfolio review. Periodic reviews generally occur twice a year and also communicate reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended. Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur. The initial meeting, which may be scheduled by calling 603-224-1010, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

JAMES E KNEE is a 100% owner of Sterling Financial Services, LLC

Types of Advisory Services

STERLING FINANCIAL SERVICES, LLC provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services and furnishes investment advice through consultations for not held assets.

As of MARCH 15, 2012, STERLING FINANCIAL SERVICES, LLC manages approximately \$48,039,974 in assets for approximately 633 clients. Approximately \$27,905,049.26 is managed on a discretionary basis, and \$20,134,924.74 is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without client consent.

Types of Agreements: The following agreements define the typical client relationships.

Financial Planning Agreement and Not Held Asset Advisory Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed. The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client. The fee for a financial plan is predicated upon the facts known at the start of the engagement. The fee is \$250.00 per hour and is *NEGOTIABLE*. Generally, the fee is waived if we manage the assets. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary. After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. After 30 days follow-up implementation work is billed separately at the rate of \$250 per hour or under Investment Advisory quarterly fee arrangement.

Investment Advisory Agreement

Most clients choose to have STERLING FINANCIAL SERVICES, LLC manage their assets in order to obtain ongoing in-depth advice and life planning. Realistic and

measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. The annual Advisory Service Agreement fee is based on a percentage of the investable assets and range from .25% to 2.00%. Current client relationships exist where the fees may be higher or lower than the fee schedule above and is negotiable. Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Hourly Planning Engagements

STERLING FINANCIAL SERVICES, LLC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$250.00 per hour.

Asset Management

Assets are invested primarily in no-load mutual funds and exchange-traded funds, usually through Fidelity Investments. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. STERLING FINANCIAL SERVICES, LLC does not receive any compensation, in any form, from fund companies. Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts and real estate investment trusts. Initial public offerings (IPO's) are generally not available through STERLING FINANCIAL SERVICES.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying STERLING FINANCIAL SERVICES, LLC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, STERLING FINANCIAL SERVICES, LLC will refund any unearned portion of the advance payment. STERLING FINANCIAL SERVICES, LLC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, STERLING FINANCIAL SERVICES, LLC will refund any unearned portion of the advance payment.

Fees and Compensation

Description

STERLING FINANCIAL SERVICES, LLC bases its fees on a percentage of assets under management, charges hourly or fixed fees for financial planning and commissions for non-fee or brokerage accounts. Financial plans are priced according to the degree of complexity associated with the client's situation. All fees are negotiable.

Fee Billing

Investment management fees are billed quarterly, in *ADVANCE*, meaning that we charge you *BEFORE* the three-month billing period has *BEGUN*. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed with the balance due upon delivery of the financial plan and are generally waived if we manage the assets.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. STERLING FINANCIAL SERVICES, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.)

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to STERLING FINANCIAL SERVICES, LLC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past due Accounts and Termination of Agreement

STERLING FINANCIAL SERVICES, LLC reserves the right to stop work on any account that is past due. In addition, STERLING FINANCIAL SERVICES, LLC reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in STERLING FINANCIAL SERVICES, LLC's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities. STERLING FINANCIAL SERVICES, LLC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

STERLING FINANCIAL SERVICES, LLC generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations and business entities. Client relationships vary in scope and length of service.

Account Minimums

STERLING FINANCIAL SERVICES, LLC has the discretion to waive the account fees. Other exceptions will apply to employees of STERLING FINANCIAL SERVICES, LLC and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis. The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases. Other sources of information that STERLING FINANCIAL

SERVICES, LLC may use include Morningstar Principia mutual fund information, Morningstar Principia stock information, Emoney Advisor, Fidelity Investment Link, Thomson Reuters Investment View, Advisor Intelligence, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use passively-managed index, exchange-traded funds and or mutual funds as the core investments, and then add actively-managed funds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets. The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, margin transactions, and option writing (including covered options, uncovered options or spreading strategies).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline. **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

STERLING FINANCIAL SERVICES, LLC is registered as a Registered Investment Advisor. We are not a broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

STERLING FINANCIAL SERVICES, LLC has arrangements that are material to its advisory or its clients with a broker-dealer, Investors Capital Corporation.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The employees of STERLING FINANCIAL SERVICES, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

STERLING FINANCIAL SERVICES, LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the STERLING FINANCIAL SERVICES, LLC *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of STERLING FINANCIAL SERVICES, LLC is James E. Knee. He reviews all employee trades each quarter. His trades are reviewed by a Compliance Supervisor at Investors Capital Corporation. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

STERLING FINANCIAL SERVICES, LLC does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. STERLING FINANCIAL SERVICES, LLC recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates. STERLING FINANCIAL SERVICES, LLC recommends brokerage firms and trust companies (qualified custodians), such as Fidelity Investments and/or Pershing, LLC. STERLING FINANCIAL SERVICES, LLC is an advisor with Investors Capitol Corporation. STERLING FINANCIAL SERVICES, LLC receive fees or commissions from brokerage accounts held at Pershing, LLC.

Best Execution

STERLING FINANCIAL SERVICES, LLC periodically reviews the execution of trades and trading fees charged at the custodian firms. STERLING FINANCIAL SERVICES, LLC does not receive any portion of the trading fees.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Account reviews are performed quarterly by JAMES E KNEE. Account reviews are performed more frequently when market conditions dictate or at client request.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Client Referrals and Other Compensation

Incoming Referrals

STERLING FINANCIAL SERVICES, LLC has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

STERLING FINANCIAL SERVICES, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Custody

Account Statements

All assets are held at qualified custodians, which mean the custodians provide account statements directly to the clients and to Sterling Financial, at 6 Loudon Road, Suite 505, Concord, NH 03301 at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by STERLING FINANCIAL SERVICES, LLC.

Net Worth Statements

Clients are frequently provided net worth statements and net worth graphs that are generated from our Consolidated Wealth Management System (Emoney), financial

planning system and Abridge Consolidated Report Statements. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

STERLING FINANCIAL SERVICES, LLC accepts discretionary authority to manage securities accounts on behalf of clients. STERLING FINANCIAL SERVICES, LLC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, STERLING FINANCIAL SERVICES, LLC consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given. The client approves the custodian to be used and the commission rates paid to the custodian. STERLING FINANCIAL SERVICES, LLC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades. Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

STERLING FINANCIAL SERVICES, LLC does not vote proxies on securities. Clients are expected to vote their own proxies. When assistance on voting proxies is requested, STERLING FINANCIAL SERVICES, LLC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

STERLING FINANCIAL SERVICES does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because STERLING FINANCIAL SERVICES does not serve as a custodian for client funds. We do not directly debit fees from client's accounts and do not require prepayment of fees of \$500 and 6 months in advance.

Business Continuity Plan

General

STERLING FINANCIAL SERVICES, LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

STERLING FINANCIAL SERVICES, LLC has signed a Business Continuation Agreement with another financial advisory firm to support STERLING FINANCIAL SERVICES, LLC in the event of JAMES E Knee's serious disability or death.

Information Security Program

Information Security

STERLING FINANCIAL SERVICES, LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

STERLING FINANCIAL SERVICES, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals. With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with nonaffiliated third parties by notifying us at any time by telephone at 603-224-1010, fax to 603-226-2489, email to

James.Knee@SterlingFinancial.Co, or in person at Sterling Financial Services, LLC office. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf. We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment. We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law. Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed. We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

STERLING FINANCIAL SERVICES, LLC requires that advisors in its employ have a bachelor's degree and/or further coursework demonstrating knowledge of investment management, financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA, FINRA Series 7, 63, 65, 66 or other securities licenses. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

JAMES E KNEE, CERTIFICATIONS

Educational Background: James E Knee received his Bachelor of Science in Biology from the University Of Bridgeport, Connecticut, and his Master of Business Administration from New Hampshire College with an Advanced Certificate in International Business. His licenses include Series 7, 24, and 63. Jim holds a NH Life and Health Insurance License.

Business Experience: James E. Knee is the registered principal and owner of Sterling Financial Services, LLC, located in Concord, NH. Jim has been providing financial advice to clients throughout the New England area since 1984.

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

JAMES E KNEE is supervised by Sarah Hilbolt, Regional Compliance Advisor, Investors Capital Corporation. She reviews JAMES E KNEE'S work through annual branch audits as well as remote interactions

SUPERVISOR'S Sarah Hilbolt contact information:

(800) 949-1422 x4803 shilbolt@investorscapital.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

EMPLOYEE LISA F THOMAS, CERTIFICATIONS

Educational Background:

Lisa Thomas has a Paralegal Certificate from Northeastern University and is pursuing a BA at Franklin Pierce College. She has Series 7, 63 Securities License, Series 65 Registered Investment Advisor Representative License and NH Health and Life Insurance License.

Business Experience: Lisa Thomas is the Vice President of Operations and Associate Wealth Advisor for Sterling Financial Services, LLC. Located in Concord, NH. Lisa has held various positions in the financial services industry since 1997.

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision: LISA F THOMAS is supervised by James E. Knee, Owner Sterling Financial Services, LLC. He reviews LISA F. THOMAS'S work through daily interaction as well as through client management system. SUPERVISOR'S James E Knee contact information:

603-224-1010 James.Knee@SterlingFinancial.Co

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None