#### Item 1 Cover Page

# **DISCLOSURE BROCHURE**

FORM ADV PART 2A



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This brochure provides information about the qualifications and business practices of Stirling Bridge Wealth Partners, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 419-832-1111. 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 STIRLING BRIDGE WEALTH PARTNERS, LLC (CRD #174122) IS AVAILABLE ON THE SEC'S WEBSITE AT

WWW.ADVISERINFO.SEC.GOV

# **Item 2: Material Changes**

# **Annual Update**

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

# **Material Changes since the Last Update**

Since the last filing of this brochure on January 9, 2025, the following changes have been made:

- Item 15 has been updated to disclose third party standing letters of authorization.
- The entire brochure has been updated for compliance and formatting purposes.

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

# **Item 3: Table of Contents**

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# **Item 4: Advisory Business**

### **Firm Description**

Stirling Bridge Wealth Partners, LLC ("Stirling Bridge") is a Limited Liability Company organized in the State of Ohio.

The firm was formed in November 2014 and became registered to offer investment advisory services in January 2015. The principal owner is Jason David Born.

### **Types of Advisory Services**

### PORTFOLIO MANAGEMENT SERVICES

Stirling Bridge offers discretionary portfolio management services to advisory Clients.

Stirling Bridge offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Stirling Bridge 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, the following:

- Investment strategy
- Asset allocation
- Risk tolerance

- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Stirling Bridge evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Stirling Bridge seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Stirling Bridge's economic, investment or other financial interests. To meet its fiduciary obligations, Stirling Bridge attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Stirling Bridge's policy is to seek fair and equitable allocation opportunities/transactions among its clients to avoid favoring one client over another over time. It is Stirling Bridge'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.

The Client will authorize Stirling Bridge discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

As part of the recommendations provided, the Client may have a financial plan completed. This may include but is not limited to a thorough review of all applicable topics such as Wills, Estate Plans and Trusts, Investments, Taxes, Qualified Plans, Insurance, Retirement Income, Social Security, and College Planning. If a conflict of interest exists between the interests of Stirling Bridge and the interests of the Client, the Client is under no obligation to act upon Stirling Bridge's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Stirling Bridge. This service will be provided at no additional cost to the Client.

#### ASSETS HELD AWAY

To all clients with existing assets held at Schwab Institutional under our management, Stirling Bridge offer as additional investment management service for accounts held elsewhere. Specifically, these accounts include 401(k), 403(b), and other defined contribution plan accounts that are incapable of being consolidated into the client's existing Schwab relationship. In the course of executing this service we utilize an Order Management System provided by Pontera to implement holistic, tax-efficient asset location, asset class diversification, and opportunistic rebalancing strategies on behalf of the client. Clients approve this service ahead of time in writing.

Stirling Bridge in no way takes custody of these held away assets. Clients enter their own password credentials, never sharing them with any personnel at Stirling Bridge. The Order Management System permits only the management of the assets and grants no ability to facilitate loans or distributions of any kind from client accounts.

Stirling Bridge uses a third-party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

### MATERIAL CONFLICTS OF INTEREST

A material conflict of interest is when the interests of Stirling Bridge and its employees may in any way interfere with those of our clients. Oftentimes, even the appearance of such interference may be considered a conflict of interest.

Stirling Bridge has organized its firm structure, operations, policies, and fee methods in a manner to minimize as many potential conflicts of interest as possible. However, as in any arrangement when one party pays a fee to another for a service, especially when the service provider is a fiduciary as in this case, conflicts of interest may arise.

As Stirling Bridge receives revenue from only one source, a level fee expressed as a percentage of our clients' assets under management, the potential for conflicts of interest is reduced when compared to other firms with broader compensation structures.

We do, however, acknowledge that whenever a client chooses to do business with us, we receive revenue by way of monthly fees. Some might consider our compensation a conflict that may encourage Stirling Bridge to promote business relationships with clients that are better served elsewhere or with other types of investments. In order to mitigate or eliminate this inherent conflict of interest, we have policies and procedures in place.

Before onboarding clients, including those with retirement assets that fall under ERISA, extensive in-person or electronic interviews take place. A detailed investor questionnaire is completed as a part of an in-depth discussion to ensure that the investment allocation,

vehicles, and accounts employed on behalf of the client are appropriate for his or her needs. An Investment Policy Statement (IPS) is constructed for every client, covering every account. This IPS delineates the goals and constraints of the relationship from the broader client level down to the account level. Risk, taxes, fees, expected returns, and other factors are considered. The IPS is reviewed with and signed by the client, ensuring a thorough understanding is had by both the service provider as well as the investor. All attempts are made to update the IPS whenever material changes occur.

Lastly, Stirling Bridge receives no other compensation from any other source apart from the level fee charged clients. We have no proprietary products. We receive no payments from any third party. The compensation of our staff is based solely on the continued, fruitful management of our clients' assets in efficient, low-cost investments.

### FIDUCIARY ACKNOWLEDGEMENT

When we provide investment advice to you regarding your current or future retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

### **Client Tailored Services and Client Imposed Restrictions**

Stirling Bridge offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Stirling Bridge from properly servicing the client account, or if the restrictions would require Stirling Bridge to deviate from its standard suite of services, Stirling Bridge reserves the right to end the relationship.

Agreements may not be assigned without written Client consent.

### Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Stirling Bridge does not sponsor nor participate in any wrap fee programs.

### **Client Assets Under Management**

Stirling Bridge has the following Client assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$62,207,325	\$0	July 16, 2025

# **Item 5: Fees and Compensation**

# **Method of Compensation and Fee Schedule**

### ASSET MANAGEMENT

Stirling Bridge offers discretionary direct asset management services to advisory Clients. Stirling Bridge charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Monthly Fee
First \$2,000,000 (\$0-\$2,000,000)	1.00%	.0833%
Your next \$2,000,000 (\$2,000,000.01 - \$4,000,000)	0.80%	.0667%
Subsequent amounts (\$4,000,000.01+)	0.60%	.0500%

This is a tiered/blended fee schedule, the asset management fee is calculated by applying different rates to different portions of the portfolio. Stirling Bridge may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

### For example (based on monthly billing period):

Client with \$2,500,000 under management would pay \$1,999.50 on a monthly basis.

<u>AUM</u>	Monthly fee	<u>Total</u>
First \$2,000,000	x 0.0833% =	\$1,666.00
Next \$500,000	x 0.0667% =	\$333.50
Grand total for the month		\$1,999.50

The annual fee is negotiable 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.). Fees are billed monthly in advance based on the amount of assets managed as of the close of business on the last business day of the previous month.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Stirling Bridge with thirty (30) days written notice to Client and by the Client at any time with written notice to Stirling Bridge. No fee adjustment will be made for account deposits and/or withdrawals during a billing period. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Stirling Bridge. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty

(30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Financial Planning Services are available to ongoing Portfolio Management Clients. The fee for this service is included in the Portfolio Management fee.

#### ASSETS HELD AWAY

Stirling Bridge offers discretionary direct asset management services to advisory Clients with assets that are held away and separate from the investment management services listed in the previous section. Stirling Bridge charges an annual investment advisory fee based on the total held away asset under management as follows:

Assets Under Management	Annual Fee	Monthly Fee
First \$2,000,000 (\$0-\$2,000,000)	1.00%	.0833%
Your next \$2,000,000 (\$2,000,000.01 - \$4,000,000)	0.80%	.0667%
Subsequent amounts (\$4,000,000.01+)	0.60%	.0500%

This is a tiered/blended fee schedule, the asset management fee is calculated by applying different rates to different portions of the portfolio. Stirling Bridge may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

### For example (based on monthly billing period):

Client with \$2,500,000 under management would pay \$1,999.50 on a monthly basis.

<u>AUM</u>	Monthly fee	<u>Total</u>
First \$2,000,000	x 0.0833% =	\$1,666.00
Next \$500,000	x 0.0667% =	\$333.50
Grand total for the month		\$1,999.50

The annual fee is negotiable 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.). Fees are billed monthly in advance based on the amount of assets managed as of the close of business on the last business day of the previous month. If margin is utilized, the fees will be billed based on the net asset value of the account.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Stirling Bridge with thirty (30) days written notice to Client and by the Client at any time with written notice to Stirling Bridge. No fee adjustment will be made for account deposits and/or withdrawals during a billing period. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Stirling Bridge. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

When a client terminates their account, the customer will be billed the prorated quarterly payment for the quarter in which such cancellation occurs.

### **Client Payment of Fees**

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in advance.

For clients who have approved Stirling Bridge's management of their held away accounts as detailed in Items 12 and 16 in this document, fees are calculated based upon the value of the assets in those same accounts using the identical fee schedule for the client's assets managed by Stirling Bridge and held at Schwab Institutional. However, the fees based on these held away accounts are allocated to accounts held at Schwab which are under our management.

### **Additional Client Fees Charged**

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Margin interest may also apply for Client electing to utilize margin on their account(s). Stirling Bridge does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Stirling Bridge. For more details on the brokerage practices, see Item 12 of this brochure.

### **Prepayment of Client Fees**

Stirling Bridge does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Investment management and asset held away fees are billed monthly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Stirling Bridge. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

The fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

### **External Compensation for the Sale of Securities to Clients**

Stirling Bridge does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of Stirling Bridge.

# Item 6: Performance-Based Fees and Side-by-Side Management

### **Sharing of Capital Gains**

Stirling Bridge does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

# **Item 7: Types of Clients**

### Description

Stirling Bridge generally provides investment advice to high net worth individuals. Client relationships vary in scope and length of service.

#### **Account Minimums**

Stirling Bridge requires a minimum of \$400,000 to open and maintain an account. In certain instances, the minimum account size may be lowered or waived.

# Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

### **Methods of Analysis**

Stirling Bridge's methods of analysis include fundamental analysis, cyclical analysis, quantitative analysis and modern portfolio theory. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

### **Investment Strategy**

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 by providing written notice to Stirling Bridge. Each Client executes an Investment Policy Statement or similar form that documents their objectives and their desired investment strategy.

Stirling Bridge uses long term trading, short term trading and options trading (including covered options, uncovered options, or spreading strategies).

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Quantitative Model Risk**: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Modern Portfolio Theory** assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Stirling Bridge's use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

# **Security Specific Material Risks**

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 and should discuss these risks with Stirling Bridge:

Stirling Bridge's use of options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant change in the attitude of speculators and investors.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S. securities** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Market Risk:** The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

**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.

**Inflation Risk:** When any type of inflation is present, a dollar today will buy more than 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.

**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.

**Management Risk:** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.

**Cash and Cash Equivalents Risk:** Cash and cash equivalents consist of investments like money market funds, certificates of deposit (CDs), Treasury bills, and short-term government bonds. They are generally considered low-risk compared to other asset classes. While they offer safety, liquidity, and stability, they come with certain risks, such as inflation, interest rate fluctuations, and opportunity costs.

**Derivatives Risk:** Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.

**Trading risk:** Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

**Trading on Margin:** In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.

**Private Equity/Placement Risk:** Because offerings are exempt from registration requirements, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security. Risk of the underlying investment may be significantly higher than publicly traded investments.

# **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

Stirling Bridge and its management have not been involved in any criminal or civil action.

# **Administrative Enforcement Proceedings**

Stirling Bridge and its management have not been involved in administrative enforcement proceedings.

### **Self- Regulatory Organization Enforcement Proceedings**

Stirling Bridge and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of Stirling Bridge or the integrity of its management.

# Item 10: Other Financial Industry Activities and Affiliations

### **Broker-Dealer or Representative Registration**

Neither Stirling Bridge nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

# **Futures or Commodity Registration**

Neither Stirling Bridge nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

# Material Relationships Maintained by this Advisory Business and Conflicts of Interest Neither Stirling Bridge nor its representatives have any material relationships to this

Neither Stirling Bridge nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

# **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**Stirling Bridge does not utilize nor select third-party investment advisers. All assets are managed by Stirling Bridge management.

# Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

### **Code of Ethics Description**

Stirling Bridge has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Stirling Bridge's Code of Ethics is available free upon request to any client or prospective client.

# Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Stirling Bridge does not recommend that clients buy or sell any security in which a related person to Stirling Bridge or Stirling Bridge has a material financial interest.

# Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

From time to time, representatives of Stirling Bridge may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Stirling Bridge to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Stirling Bridge will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

# Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

From time to time, representatives of Stirling Bridge may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Stirling Bridge to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Stirling Bridge will never engage in trading that operates to the client's disadvantage if representatives of Stirling Bridge buy or sell securities at or around the same time as clients.

# **Item 12: Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

Stirling Bridge will require the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Stirling Bridge will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees, reporting ability, execution capability (speed and accuracy), financial stability and reputation, access to markets, technology and reporting platforms, quality of client service and availability of investment research and other brokerage services. Stirling Bridge relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Stirling Bridge. Stirling Bridge does not receive any portion of the trading fees.

Stirling Bridge will require the use of Charles Schwab & Co., Inc.

• Research and Other Soft Dollar Benefits

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Stirling Bridge from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Stirling Bridge has no

formal soft dollar arrangements, Stirling Bridge may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, Stirling Bridge receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Stirling Bridge. Stirling Bridge cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. Stirling Bridge does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Stirling Bridge receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Stirling Bridge has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- Brokerage for Client Referrals
  Stirling Bridge does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
- Directed Brokerage
   Stirling Bridge does not allow directed brokerage accounts. Not all advisors require their clients to direct brokerage.
- Trade Away/Delivery Versus Payment (DVP) Relationships
  From time to time Stirling Bridge may direct client brokerage to JPMorgan Securities, LLC. If such a service is deemed appropriate, clients are made aware of the possibility of the trading relationship in advance. Clients then approve of and sign an authorization before any trades are ever made away from Schwab Institutional. In the course of such trading, Stirling Bridge maintains its aforementioned obligation to seek "best execution."

The decision to trade at JPM Securities, LLC and settle at Schwab Institutional is made on a case-by-case basis. Some factors which aid in the determination include availability, liquidity, and pricing of the instrument (e.g. stock or bond) in question. Stirling Bridge also considers services provided, ease of use, fees or commissions charged, among other criteria. JPM Securities, LLC provides Stirling Bridge access to written research reports and oral communication with a broker.

### **Aggregating Securities Transactions for Client Accounts**

If Stirling Bridge buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Stirling Bridge would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Stirling Bridge would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

### Item 13: Review of Accounts

# Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

All client accounts for Stirling Bridge's advisory services provided on an ongoing basis are reviewed at least monthly by Jason D Born, Portfolio Manager with regard to clients' respective investment policies and risk tolerance levels. All accounts at Stirling Bridge are assigned to this reviewer.

### Review of Client Accounts on Non-Periodic Basis

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **Content of Client Provided Reports and Frequency**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance). Performance reports will be provided by Stirling Bridge at client meetings to Clients with assets under management.

# **Item 14: Client Referrals and Other Compensation**

# **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

Stirling Bridge receives additional economic benefits from external sources as described above in Item 12.

### **Advisory Firm Payments for Client Referrals**

Stirling Bridge does not directly or indirectly compensate any person who is not advisory personnel for Client referrals.

# **Item 15: Custody**

#### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Stirling Bridge.

Stirling Bridge is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Stirling Bridge.

Stirling Bridge is also deemed to have limited custody due to its Third-Party Standing Letters of Authorization ("SLOA").

Stirling Bridge and its qualified custodian meet the following seven (7) conditions in order to avoid maintaining full custody and be subject to the surprise exam requirement:

1. The Client provides an instruction to the qualified custodian, in writing, that includes the Client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.

- 2. The Client authorizes Stirling Bridge, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- 3. The Client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the Client's authorization and provides a transfer of funds notice to the Client promptly after each transfer.
- 4. The Client has the ability to terminate or change the instruction to the Client's qualified custodian.
- 5. Stirling Bridge has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the Client's instruction.
- 6. Stirling Bridge maintains records showing that the third party is not a related party nor located at the same address as Stirling Bridge.
- 7. The Client's qualified custodian sends the Client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

Stirling Bridge requires discretionary authority to manage securities accounts on behalf of Clients. Stirling Bridge 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. Client will authorize Stirling Bridge discretionary authority as stated within the Investment Advisory Agreement.

In those instances where a client has signed a Prime Broker Agreement, granting Stirling Bridge permission to place trades away from the custodian, Stirling Bridge uses discretion when determining which broker to use when placing trades. The decision is made on a case-by-case basis while considering multiple factors of best execution as highlighted in Item 12 of this document.

In those instances where a client has granted Stirling Bridge permission to utilize an Order Management System to holistically manage their held away defined contribution plan account as detailed in Item 12 of this document, the investment choices available to Stirling Bridge are limited to those permitted by the client's plan. Since each client with a defined contribution plan account may have different options available, the decision of which specific vehicles to employ will be based upon multiple factors including, but not limited to, cost, client goals, client risk tolerance, expected returns, and time horizon.

Stirling Bridge allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to Stirling Bridge in writing.

The Client approves the custodian to be used. Stirling Bridge does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

# **Item 17: Voting Client Securities**

### **Proxy Votes**

Stirling Bridge acknowledges its fiduciary obligation to vote proxies on behalf of those clients that have delegated to it, or for which it is deemed to have, proxy voting authority. Stirling Bridge will vote proxies on behalf of a client solely in the best interest of the relevant client and has established general guidelines for voting proxies. Stirling Bridge may also abstain from voting if, based on factors such as expense or difficulty of exercise, it determines that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances may vary, Stirling Bridge may vote in a manner that is contrary to the general guidelines if it believes that doing so would be in a client's best interest to do so. If a proxy proposal presents a material conflict of interest between Stirling Bridge and a client, then Stirling Bridge will determine how to vote that proxy and whether the conflict of interest will be disclosed to the client.

Clients may obtain a complete copy of the proxy voting policies and procedures by contacting Stirling Bridge in writing and requesting such information. Each client may also request, by contacting Stirling Bridge in writing, information concerning the manner in which proxy votes have been cast with respect to portfolio securities held by the relevant client during the prior annual period.

### **Item 18: Financial Information**

#### **Balance Sheet**

Stirling Bridge neither requires nor solicits prepayment of more than \$500 in fees per client and six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

# Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Neither Stirling Bridge nor its management has any financial condition that is likely to reasonably impair Stirling Bridge's ability to meet contractual commitments to clients.

### **Bankruptcy Petitions during the Past Ten Years**

Stirling Bridge has not been the subject of any bankruptcy petitions in the last ten years.

# **Item 19: Requirements for State Registered Advisors**

### **Principal Executive Officers and Management Persons**

Stirling Bridge currently has only one management person: Jason David Born. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

#### **Outside Business Activities**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

### **Performance Based Fee Description**

Stirling Bridge does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

# Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

See Item 10 and 11.

Item 1 Cover Page

# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Jason Born, CFA



# Office Address:

1246 County Road Q McClure, OH 43534

**Tel:** 419-832-1111

Email: <u>Jason@stirlingbridgewealthpartners.com</u>

Website: www.stirlingbridgewealthpartners.com

August 6, 2025

This brochure supplement provides information about Jason Born and supplements the Stirling Bridge Wealth Partners, LLC brochure. You should have received a copy of that brochure. Please contact Jason Born if you did not receive the brochure or if you have any questions about the contents of this supplement.

ADDITIONAL INFORMATION ABOUT JASON BORN (CRD #3066122) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.

# **Brochure Supplement (Part 2B of Form ADV)**

**Supervised Person Brochure** 

### Principal Executive Officer - Jason Born, CFA

• Year of birth: 1973

# Item 2 - Educational Background and Business Experience

**Educational Background:** 

- Case Western Reserve University; Master of Business Administration; 1998
- Ashland University; Bachelor of Science Business Administration; 1997

### **Professional Certifications**

David Born has earned certifications and credentials that are required to be explained in further detail.

<u>Chartered Financial Analyst (CFA)</u>: Chartered Financial Analysts designation is awarded by the CFA Institute. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent educational or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.

Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

# Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

### **Business Experience:**

- Stirling Bridge Wealth Partners, LLC.; Portfolio Manager/Managing Member/Investment Advisor Representative/Chief Compliance Officer; 01/2015-Present
- Camelot Portfolios, LLC; Investment Advisor Representative; 05/2012-01/2015
- Huntington Bancorp; Senior Portfolio Manager; 12/2011-05/2012
- PNC Financial; Senior Portfolio Manager; 11/2006-12/2011
- OI; Financial Analyst; 09/2006-11/2006

### **Item 3 - Disciplinary Information**

- A. Mr. Born has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
  - 1. Was convicted of, or pled guilty or nolo contender ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  - 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful

- taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
- 3. Was found to have been involved in a violation of an investment-related statute or regulation; or
- 4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Born never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
  - 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
    - (a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Born has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
  - 1. Was found to have caused an investment-related business to lose its authorization to do business; or
  - 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Born has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

### **Item 4 - Other Business Activities**

Jason David Born is not engaged in any investment-related business or occupation (other than this advisory firm).

### **Item 5 - Additional Compensation**

Jason David Born does not receive any economic benefit from any person, company, or organization, other than Stirling Bridge Wealth Partners, LLC in exchange for providing clients advisory services through Stirling Bridge Wealth Partners, LLC.

### **Item 6 - Supervision**

As the only owner and representative of Stirling Bridge Wealth Partners, LLC, Jason David Born supervises all activities of the firm. Jason David Born's response information is on the cover page of this disclosure document. Jason David Born adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all

policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

# Item 7 - Requirements for State-Registered Advisors

- A. Mr. Born has not been involved in any of the following:
  - 1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
    - i. An investment or an investment-related business or activity;
    - ii. Fraud, false statement(s) or omissions;
    - iii. Theft, embezzlement or other wrongful taking of property;
    - iv. Bribery, forgery, counterfeiting, or extortion;
    - v. Dishonest, unfair or unethical practices.
  - 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - i. An investment or an investment-related business or activity;
    - ii. Fraud, false statement(s) or omissions;
    - iii. Theft, embezzlement or other wrongful taking of property;
    - iv. Bribery, forgery, counterfeiting, or extortion;
    - v. Dishonest, unfair or unethical practices.
- B. Mr. Born has never been the subject of a bankruptcy petition.