

# FORM ADV (Paper Version)

## UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

### PART 1A

**WARNING:** Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 3.

Check the box that indicates what you would like to do (check all that apply):

- ☐ Submit an initial application to register as an investment adviser with the SEC.
- ☐ Submit an initial application to register as an investment adviser with one or more states.
- ☐ Submit an *annual updating amendment* to your registration for your fiscal year ended \_\_\_\_\_
- ☒ Submit an other-than-annual amendment to your registration.

### Item Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):

**Stewart and Patten Co., LLC**

B. Name under which you primarily conduct your advisory business, if different from Item 1.A.

*List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.*

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.), enter the new name and specify whether the name change is of ☐ your legal name or ☐ your primary business name:

D. If you are registered with the SEC as an investment adviser, your SEC file number: 801- **55172**

E. If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number:

**109235**

*If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.*

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	Date <b>5/5/2009</b>	SEC 801-Number <b>801- 55172</b>

F. *Principal Office and Place of Business*

(1) Address (do not use a P.O. Box):

**1 Post Street, Suite 850**

(number and street)

**San Francisco**

**CA**

**94104**

(city)

(state/country)

(zip+4/postal code)

If this address is a private residence, check this box:

☐

*List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for registration, or are registered only, with the SEC, list the largest five offices in terms of numbers of employees.*

(2) Days of week that you normally conduct business at your *principal office and place of business*:

☒ Monday - Friday    ☐ Other:

Normal business hours at this location: **7:30 AM to 4:00 PM**

(3) Telephone number at this location: **415-421-4932**

(area code)

(telephone number)

(4) Facsimile number at this location: **415-421-0710**

(area code)

(telephone number)

G. Mailing address, if different from your *principal office and place of business* address:

(number and street)

(city)

(state/country)

(zip+4/postal code)

If this address is a private residence, check this box:

☐

H. If you are a sole proprietor, state your full residence address, if different from your *principal office and place of business* address in Item 1.F.:

(number and street)

(city)

(state/country)

(zip+4/postal code)

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I. Do you have World Wide Web site addresses? Yes ☒ No ☐

*If "yes" list these addresses on Section I.I of Schedule D. If a web address serves as a portal through which to access other information you have published on the World Wide Web, you may list the portal without listing addresses for all of the other information. Some advisers may need to list more than one portal address. Do not provide individual electronic mail addresses in response to this Item.*

J. Contact Employee:

**Steve Ethridge**

(name)

**Principal, Chief Compliance Officer**

(title)

**415-421-4932**

(area code) (telephone number)

**415-421-0710**

(area code) (facsimile number)

**1 Post Street, Suite 850**

(number and street)

**San Francisco**

**CA**

**94104**

(city)

(state/country)

(zip+4/postal code)

**steve@stewartandpatten.com**

(electronic mail (e-mail) address, if contact employee has one)

*The contact employee should be an employee whom you have authorized to receive information and respond to questions about this Form ADV.*

K. Do you maintain some or all of the books and records you are required to keep under Section 204 of the Advisers Act, or similar state law, somewhere other than your principal office and place of business?

Yes ☐ No ☒

*If "yes," complete Section I.K. of Schedule D.*

L. Are you registered with a foreign financial regulatory authority? Yes ☐ No ☒

*Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial regulatory authority. If "yes," complete Section I.L. of Schedule D.*

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## Item 2 SEC Registration

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2 only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration.

- A. To register (or remain registered) with the SEC, you must check at least one of the Items 2.A(1) through 2.A(11), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A(12). You:

☒ (1) have *assets under management* of \$25 million (in U.S. dollars) or more;

*See Part 1A Instruction 2.a. to determine whether you should check this box.*

☐ (2) have your *principal office and place of business* in Wyoming;

☐ (3) have your *principal office and place of business* outside the United States;

☐ (4) are an investment adviser (or sub-adviser) to an investment company registered under the Investment Company Act of 1940;

*See Part 1A Instruction 2.b. to determine whether you should check this box.*

☐ (5) have been designated as a nationally recognized statistical rating organization;

*See Part 1A Instruction 2.c. to determine whether you should check this box.*

☐ (6) are a pension consultant that qualifies for the exemption in rule 203A-2(b);

*See Part 1A Instruction 2.d. to determine whether you should check this box.*

☐ (7) are relying on rule 203A-2(c) because you are an investment adviser that *controls*, is *controlled* by, or is under common *control* with, an investment adviser that is registered with the SEC, and your *principal office and place of business* is the same as the registered adviser;

*See Part 1A Instruction 2.e. to determine whether you should check this box. If you check this box, complete Section 2.A (7) of Schedule D.*

☐ (8) are a newly formed adviser relying on rule 203A-2(d) because you expect to be eligible for SEC registration within 120 days;

*See Part 1A Instruction 2.f. to determine whether you should check this box. If you check this box, complete Section 2.A(8) of Schedule D.*

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☐ (9) are a multi-state adviser relying on rule 203A-2(e);

*See Part 1A Instruction 2.g. to determine whether you should check this box. If you check this box, complete Section 2.A(9) of Schedule D.*

☐ (10) are an Internet investment adviser relying on rule 203A-2(f);

*See Part 1A Instructions 2.h to determine whether you should check this box.*

☐ (11) have received an SEC order exempting you from the prohibition against registration with the SEC;

*If you check this box, complete Section 2.A(11) of Schedule D.*

☐ (12) are no longer eligible to remain registered with the SEC.

*See Part 1A Instructions 2.i. to determine whether you should check this box.*

- B. Under state laws, SEC-registered advisers may be required to provide to *state securities authorities* a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. If this is an initial application, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings you submit to the SEC. If this is an amendment to direct your *notice filings* to additional state(s), check and circle the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings you submit to the SEC. If this is an amendment to your registration to stop your *notice filings* from going to state(s) that currently receive them, circle the unchecked box(es) next to those state(s).

<input type="checkbox"/> AL	<input type="checkbox"/> CT	<input type="checkbox"/> HI	<input type="checkbox"/> KY	<input type="checkbox"/> MN	<input type="checkbox"/> NH	<input type="checkbox"/> OH	<input type="checkbox"/> SC	<input type="checkbox"/> VI
<input type="checkbox"/> AK	<input type="checkbox"/> DE	<input type="checkbox"/> ID	<input type="checkbox"/> LA	<input type="checkbox"/> MS	<input type="checkbox"/> NJ	<input type="checkbox"/> OK	<input type="checkbox"/> SD	<input type="checkbox"/> VA
<input type="checkbox"/> AZ	<input type="checkbox"/> DC	<input type="checkbox"/> IL	<input type="checkbox"/> ME	<input type="checkbox"/> MO	<input type="checkbox"/> NM	<input type="checkbox"/> OR	<input type="checkbox"/> TN	<input checked="" type="checkbox"/> WA
<input type="checkbox"/> AR	<input type="checkbox"/> FL	<input type="checkbox"/> IN	<input type="checkbox"/> MD	<input type="checkbox"/> MT	<input type="checkbox"/> NY	<input type="checkbox"/> PA	<input type="checkbox"/> TX	<input type="checkbox"/> WV
<input checked="" type="checkbox"/> CA	<input type="checkbox"/> GA	<input type="checkbox"/> IA	<input type="checkbox"/> MA	<input type="checkbox"/> NE	<input type="checkbox"/> NC	<input type="checkbox"/> PR	<input type="checkbox"/> UT	<input type="checkbox"/> WI
<input type="checkbox"/> CO	<input type="checkbox"/> GU	<input type="checkbox"/> KS	<input type="checkbox"/> MI	<input type="checkbox"/> NV	<input type="checkbox"/> ND	<input type="checkbox"/> RI	<input checked="" type="checkbox"/> VT	

*If you are amending your registration to stop your notice filings from going to a state that currently receives them and you do not want to pay that state's notice filing fee for the coming year, your amendment must be filed before the end of the year (December 31).*

### Item 3 Form of Organization

A. How are you organized?

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Corporation            | <input type="checkbox"/> Sole Proprietorship                        | <input type="checkbox"/> Limited Liability Partnership (LLP) |
| <input type="checkbox"/> Partnership            | <input checked="" type="checkbox"/> Limited Liability Company (LLC) |  |
| <input type="checkbox"/> Other (specify): _____ |   |  |

*If you are changing your response to this Item, see Part 1A Instruction 4.*

B. In what month does your fiscal year end each year?

December

C. Under the laws of what state or country are you organized?

California, USA

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*If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.*

*If you are changing your response to this Item, see Part 1A Instruction 4.*

## Item 4 Successions

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser?

☐ Yes ☒ No

*If "yes," complete Item 4.B. and Section 4 of Schedule D.*

B. Date of Succession: \_\_\_\_\_

(mm/dd/yyyy)

*If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.*

## Item 5 Information About Your Advisory Business

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly-formed advisers for completing this Item 5.

### Employees

A. Approximately how many *employees* do you have? Include full and part-time *employees* but do not include any clerical workers.

☐ 1- 5 ☒ 6- 10 ☐ 11-50 ☐ 51-250 ☐ 251-500 ☐ 501-1,000 ☐ More than 1,000

If more than 1,000, how many? \_\_\_\_\_ (round to the nearest 1,000)

B.

(1) Approximately how many of these *employees* perform investment advisory functions (including research)?

☐ 0 ☒ 1-5 ☐ 6-10 ☐ 11-50 ☐ 51-250 ☐ 251-500 ☐ 501-1,000

☐ More than 1,000 If more than 1,000, how many? \_\_\_\_\_ (round to the nearest 1,000)

(2) Approximately how many of these *employees* are registered representatives of a broker-dealer?

☒ 0 ☐ 1-5 ☐ 6-10 ☐ 11-50 ☐ 51-250 ☐ 251-500 ☐ 501-1,000

☐ More than 1,000 If more than 1,000, how many? \_\_\_\_\_ (round to the nearest 1,000)

*If you are organized as a sole proprietorship, include yourself as an employee in your responses to Items 5.A(1) and 5.B(2). If an employee performs more than one function, you should count that employee in each of your responses to Item 5.B(1) and 5.B(2).*

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(3) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

☒ 0    ☐ 1-5    ☐ 6-10    ☐ 11-50    ☐ 51-250    ☐ 251-500    ☐ 501-1,000  
☐ More than 1,000    If more than 1,000, how many? \_\_\_\_\_ (round to the nearest 1,000)

*In your response to Item 5.B(3), do not count any of your employees and count a firm only once - do not count each of the firm's employees that solicit on your behalf.*

### Clients

C. To approximately how many *clients* did you provide investment advisory services during your most-recently completed fiscal year?

☐ 0    ☐ 1-10    ☐ 11-25    ☐ 26-100    ☐ 101-250    ☒ 251-500  
☐ More than 500    If more than 500, how many? \_\_\_\_\_ (round to the nearest 500)

D. What types of *clients* do you have? Indicate the approximate percentage that each type of *client* comprises of your total number of *clients*.

	None	Up To 10%	11-25%	26-50%	51-75%	More Than 75%
(1) Individuals (other than high net worth individuals)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) High net worth individuals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Banking or thrift institutions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(4) Investment companies (including mutual funds)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(5) Pension and profit sharing plans (other than plan participants)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(6) Other pooled investment vehicles (e.g., hedge funds)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(7) Charitable organizations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(8) Corporations or other businesses not listed above	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(9) State or municipal government entities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(10) Other: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*The category "individuals" includes trusts, estates, 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.*

*Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, check "None" in response to Item 5.D(4).*

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### Compensation Arrangements

E. You are compensated for your investment advisory services by (check all that apply):

- ☒ (1) A percentage of assets under your management
- ☐ (2) Hourly charges
- ☐ (3) Subscription fees (for a newsletter or periodical)
- ☐ (4) Fixed fees (other than subscription fees)
- ☐ (5) Commissions
- ☐ (6) *Performance-based fees*
- ☐ (7) Other (specify): \_\_\_\_\_

### Assets Under Management

F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios? ☒ Yes ☐ No

(2) If yes, what is the amount of your assets under management and total number of accounts?

	U.S. Dollar Amount	Total Number of Accounts
Discretionary:	(a) \$ <b>553,473,281</b> .00	(d) <b>707</b>
Non-Discretionary:	(b) \$ <b>7,360,072</b> .00	(e) <b>27</b>
Total:	(c) \$ <b>560,833,353</b> .00	(f) <b>734</b>

*Part 1A Instruction 5.b. explains how to calculate your assets under management. You must follow these instructions carefully when completing this Item.*

### Advisory Activities

G. What type(s) of advisory services do you provide? Check all that apply.

- ☐ (1) Financial planning services
- ☒ (2) Portfolio management for individuals and/or small businesses
- ☐ (3) Portfolio management for investment companies
- ☒ (4) Portfolio management for businesses or institutional *clients* (other than investment companies)
- ☐ (5) Pension consulting services
- ☐ (6) Selection of other advisers
- ☐ (7) Publication of periodicals or newsletters
- ☐ (8) Security ratings or pricing services
- ☐ (9) Market timing services
- ☐ (10) Other (specify): \_\_\_\_\_

*Do not check Item 5.G(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940.*



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H. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?

- ☐ 0      ☐ 1-10      ☐ 11-25      ☐ 26-50      ☐ 51-100      ☐ 101-250      ☐ 251-500  
☐ More than 500      If more than 500, how many? \_\_\_\_\_ (round to the nearest 500)

I. If you participate in a *wrap fee program*, do you (check all that apply):

- ☐ (1) *sponsor* the *wrap fee program*?  
☐ (2) act as a portfolio manager for the *wrap fee program*?

*If you are a portfolio manager for a wrap fee program, list the names of the programs and their sponsors in Section 5.I(2) of Schedule D.*

*If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check either Item 5.I(1) or 5.I(2).*

## Item 6 Other Business Activities

In this Item, we request information about your other business activities.

A. You are actively engaged in business as a (check all that apply):

- ☐ (1) Broker-dealer  
☐ (2) Registered representative of a broker-dealer  
☐ (3) Futures commission merchant, commodity pool operator, or commodity trading advisor  
☐ (4) Real estate broker, dealer, or agent  
☐ (5) Insurance broker or agent  
☐ (6) Bank (including a separately identifiable department or division of a bank)  
☐ (7) Other financial product salesperson (specify): \_\_\_\_\_

B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? ☐ Yes ☒ No

(2) If yes, is this other business your primary business? ☐ Yes ☒ No

*If "yes," describe this other business on Section 6.B. of Schedule D.*

(3) Do you sell products or provide services other than investment advice to your advisory *clients*?

- ☐ Yes ☒ No

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## Item 7 Financial Industry Affiliations

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

Item 7 requires you to provide information about you and your *related persons*. Your *related persons* are all of your advisory affiliates and any *person* that is under common *control* with you.

A. You have a *related person* that is a (check all that apply):

- ☐ (1) broker-dealer, municipal securities dealer, or government securities broker or dealer
- ☐ (2) investment company (including mutual funds)
- ☐ (3) other investment adviser (including financial planners)
- ☐ (4) futures commission merchant, commodity pool operator, or commodity trading advisor
- ☐ (5) banking or thrift institution
- ☐ (6) accountant or accounting firm
- ☐ (7) lawyer or law firm
- ☐ (8) insurance company or agency
- ☐ (9) pension consultant
- ☐ (10) real estate broker or dealer
- ☐ (11) sponsor or syndicator of limited partnerships

*If you checked item 7.A.(3), you must list on Section 7.A. of Schedule D all your related persons that are investment advisers. If you checked Item 7.A.(1), you may elect to list on Section 7.A. of Schedule D all your related persons that are broker-dealers. If you choose to list a related broker-dealer, the IARD system will accept a single Form U4 to register an investment adviser representative who also is a broker-dealer agent ("registered rep") of that related broker-dealer.*

B. Are you or any *related person* a general partner in an *investment-related* limited partnership or manager of an *investment-related* limited liability company, or do you advise any other "private fund," as defined under SEC rule 203(b)(3)-1? ☐ Yes ☒ No

*If "yes," for each limited partnership or limited liability company, or (if applicable) private fund, complete Section 7.B. of Schedule D. If, however, you are an SEC-registered adviser and you have related persons that are SEC-registered advisers who are the general partners of limited partnerships or the managers of limited liability companies, you do not have to complete Section 7.B. of Schedule D with respect to those related advisers' limited partnerships or limited liability companies.*

*To use this alternative procedure, you must state in the Miscellaneous Section of Schedule D:*

- (1) that you have related SEC-registered investment advisers that manage limited partnerships or limited liability companies that are not listed in Section 7.B. of your Schedule D;*
- (2) that complete and accurate information about those limited partnerships or limited liability companies is available in Section 7.B. of Schedule D of the Form ADVs of your related SEC-registered advisers; and*
- (3) whether your clients are solicited to invest in any of those limited partnerships or limited liability companies.*

## Item 8 Participation or Interest in *Client* Transactions

In this Item, we request information about your participation and interest in your *clients'* transactions. Like Item 7, this information identifies areas in which conflicts of interest may occur between you and your *clients*.

Like Item 7, Item 8 requires you to provide information about you and your *related persons*.

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### Proprietary Interest in *Client* Transactions

- | A. Do you or any <i>related person</i> :  | <u>Yes</u>                          | <u>No</u>                           |
|---|-------------------------------------|-------------------------------------|
| (1) buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A(1) or (2))? | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

### Sales Interest in *Client* Transactions

- | B. Do you or any <i>related person</i> :   | <u>Yes</u>               | <u>No</u>                           |
|--|--------------------------|-------------------------------------|
| (1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?        | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### Investment or Brokerage Discretion

- | C. Do you or any <i>related person</i> have <i>discretionary authority</i> to determine the:         | <u>Yes</u>                          | <u>No</u>                           |
|--|-------------------------------------|-------------------------------------|
| (1) securities to be bought or sold for a <i>client's</i> account?                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (2) amount of securities to be bought or sold for a <i>client's</i> account?                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions? | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

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- |  | <u>Yes</u>                          | <u>No</u>                           |
|--|-------------------------------------|-------------------------------------|
| D. Do you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| E. Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party in connection with <i>client</i> securities transactions? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| F. Do you or any <i>related person</i> , directly or indirectly, compensate any <i>person</i> for <i>client</i> referrals?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

*In responding to this Item 8.F., consider in your response all cash and non-cash compensation that you or a related person gave any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.*

## Item 9 Custody

In this Item, we ask you whether you or a *related person* has *custody* of *client* assets. If you are registering or registered with the SEC and you deduct your advisory fees directly from your *clients'* accounts but you do not otherwise have *custody* of your *clients'* funds or securities, you may answer "no" to Item 9A.(1) and 9A.(2).

- |   | <u>Yes</u>                          | <u>No</u>                           |
|---|-------------------------------------|-------------------------------------|
| A. Do you have <i>custody</i> of any advisory <i>clients'</i> :   |                                     |                                     |
| (1) cash or bank accounts?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (2) securities?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| B. Do any of your <i>related persons</i> have <i>custody</i> of any of your advisory <i>clients'</i> :  |                                     |                                     |
| (1) cash or bank accounts?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (2) securities?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| C. If you answered "yes" to either Item 9.B(1) or 9.B(2), is that <i>related person</i> a broker-dealer registered under Section 15 of the Securities Exchange Act of 1934? | <input type="checkbox"/>            | <input type="checkbox"/>            |

## Item 10 Control Persons

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you.

If you are submitting an initial application, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application, you must complete Schedule C.

Does any *person* not named in Item 1.A. or Schedules A, B or C, directly or indirectly, *control* your management or policies?      ☐ Yes      ☒ No

*If yes, complete Section 10 of Schedule D.*

<b>FORM ADV</b> Part 1A Page 13 of 16	Your Name	<b>Stewart and Patten Co., LLC</b>	CRD Number	<b>109235</b>
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## Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

*If you are registered or registering with the SEC, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A(1), 11.A(2), 11.B(1), 11.B(2), 11.D(4), and 11.H(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.*

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

For "Yes" answers to the following questions, complete a Criminal Action DRP.

- | A. In the past ten years, have you or any advisory affiliate:   | <u>Yes</u>               | <u>No</u>                           |
|---|--------------------------|-------------------------------------|
| (1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) been <i>charged</i> with any <i>felony</i> ?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

*If you are registered or registering with the SEC, you may limit your response to Item 11.A(2) to charges that are currently pending.*

- |   |                          |                                     |
|---|--------------------------|-------------------------------------|
| B. In the past ten years, have you or any <i>advisory affiliate</i> :   |                          |                                     |
| (1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) been charged with a misdemeanor listed in Item 11.B(1)?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

*If you are registered or registering with the SEC, you may limit your response to Item 11.B(2) to charges that are currently pending.*

<b>FORM ADV</b> Part 1A Page 14 of 16	Your Name <b>Stewart and Patten Co., LLC</b>	CRD Number <b>109235</b>
	Date <b>5/5/2009</b>	SEC 801-Number <b>801- 55172</b>

For "yes" answers to the following questions, complete a Regulatory Action DRP

- |   | <u>Yes</u>               | <u>No</u>                           |
|---|--------------------------|-------------------------------------|
| C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:   |                          |                                     |
| (1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of SEC or CFTC regulations or statutes?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (3) <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with <i>investment-related</i> activity?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (5) imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| D. Has any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> :   |                          |                                     |
| (1) ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or statutes?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (5) ever denied, suspended, or revoked your or any <i>advisory affiliate's</i> registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> , from associating with an <i>investment-related</i> business or restricted your or any <i>advisory affiliate's</i> activity? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| E. Has any <i>self-regulatory organization</i> or commodities exchange ever:  |                          |                                     |
| (1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of its rules (other than a violation designated as a " <i>minor rule violation</i> " under a plan approved by the SEC)?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

<b>FORM ADV</b> Part 1A Page 15 of 16	Your Name <b>Stewart and Patten Co., LLC</b>	CRD Number <b>109235</b>
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- |  | <u>Yes</u>               | <u>No</u>                           |
|--|--------------------------|-------------------------------------|
| (3) <i>found</i> you or any <i>advisory affiliate</i> to have been the cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) disciplined you or any <i>advisory affiliate</i> by expelling or suspending you or the <i>advisory affiliate</i> from membership, barring or suspending you or the <i>advisory affiliate</i> from association with other members, or otherwise restricting your or the <i>advisory affiliate's</i> activities? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any <i>advisory affiliate</i> ever been revoked or suspended?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| G. Are you or any <i>advisory affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

For "yes" answers to the following questions, complete a Civil Judicial Action DRP.

- |  | <u>Yes</u>               | <u>No</u>                           |
|--|--------------------------|-------------------------------------|
| H. (1) Has any domestic or foreign court:  |                          |                                     |
| (a) in the past ten years, <i>enjoined</i> you or any <i>advisory affiliate</i> in connection with any <i>investment-related</i> activity?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (b) ever <i>found</i> that you or any <i>advisory affiliate</i> were <i>involved</i> in a violation of <i>investment-related</i> statutes or regulations?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (2) Are you or any <i>advisory affiliate</i> now the subject of any civil <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.H(1)?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## Item 12 Small Businesses

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC and you indicated in response to Item 5.F(2)(c) that you have assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

<b>FORM ADV</b> Part 1A Page 16 of 16	Your Name <b>Stewart and Patten Co., LLC</b>	CRD Number <b>109235</b>
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For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- Control means the power to direct or cause the direction of the management or policies of a *person*, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another *person* is presumed to control the other *person*.

	<u>Yes</u>	<u>No</u>
A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	<input type="checkbox"/>	<input type="checkbox"/>

If "yes," you do not need to answer Items 12.B. and 12.C.

B. Do you:

- |   |                          |                          |
|---|--------------------------|--------------------------|
| (1) <i>control</i> another investment adviser that had assets under management of \$25 million or more on the last day of its most recent fiscal year?              | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) <i>control</i> another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? | <input type="checkbox"/> | <input type="checkbox"/> |

C. Are you:

- |   |                          |                          |
|---|--------------------------|--------------------------|
| (1) <i>controlled</i> by or under common <i>control</i> with another investment adviser that had assets under management of \$25 million or more on the last day of its most recent fiscal year?              | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) <i>controlled</i> by or under common <i>control</i> with another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? | <input type="checkbox"/> | <input type="checkbox"/> |



Uniform Application for Investment Adviser Registration

OMB APPROVAL	
OMB Number:	3235-0049
Expires:	February 28, 2011
Estimated average burden hours per response. . . . .	
4.07	

Name of Investment Adviser: Stewart and Patten Co., LLC				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code Telephone Number
120 Montgomery St., Ste. 1700	San Francisco	CA	94104	(415 ) 421-4932

This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.

<b>1. A. Advisory Services and Fees.</b> (check the applicable boxes)		For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)	
<b>Applicant:</b>			
<input checked="" type="checkbox"/>	(1) Provides investment supervisory services . . . . .	<b>100</b>	%
<input type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services . . . . .		%
<input type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either service described above . . . . .		%
<input type="checkbox"/>	(4) Issues periodicals about securities by subscription . . . . .		%
<input type="checkbox"/>	(5) Issues special reports about securities not included in any service described above . . . . .		%
<input type="checkbox"/>	(6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . .		%
<input type="checkbox"/>	(7) On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .		%
<input type="checkbox"/>	(8) Provides a timing service . . . . .		%
<input type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above . . . . .		%
(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)			
<b>B.</b> Does applicant call any of the services it checked above financial planning or some similar term? . . . . .		Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>C.</b> Applicant offers investment advisory services for: (check all that apply)			
<input checked="" type="checkbox"/>	(1) A percentage of assets under management	<input type="checkbox"/>	(4) Subscription fees
<input type="checkbox"/>	(2) Hourly charges	<input type="checkbox"/>	(5) Commissions
<input type="checkbox"/>	(3) Fixed fees (not including subscription fees)	<input type="checkbox"/>	(6) Other
<b>D.</b> For each checked box in A above, describe on Schedule F:			
<ul style="list-style-type: none"> <li>the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee</li> <li>applicant's basic fee schedule, how fees are charged and whether its fees are negotiable</li> <li>when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date</li> </ul>			
<b>2. Types of Clients</b> — Applicant generally provides investment advice to: (check those that apply)			
<input checked="" type="checkbox"/>	A. Individuals	<input checked="" type="checkbox"/>	E. Trusts, estates, or charitable organizations
<input type="checkbox"/>	B. Banks or thrift institutions	<input checked="" type="checkbox"/>	F. Corporations or business entities other than those listed above
<input type="checkbox"/>	C. Investment companies	<input type="checkbox"/>	G. Other (describe on Schedule F)
<input checked="" type="checkbox"/>	D. Pension and profit sharing plans		

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

3.
Types of Investments.
Applicant offers advice on the following: (check those that apply)

☒
A.
Equity securities

☒
(1)
exchange-listed securities

☒
(2)
securities traded over-the-counter

☐
(3)
foreign issuers

☐
B.
Warrants

☒
C.
Corporate debt securities (other than commercial paper)

☐
D.
Commercial paper

☒
E.
Certificates of deposit

☒
F.
Municipal securities

G.
Investment company securities:

☐
(1)
variable life insurance

☐
(2)
variable annuities

☐
(3)
mutual fund shares

☒
H.
United States government securities

I.
Options contracts on:

☐
(1)
securities

☐
(2)
commodities

J.
Futures contracts on:

☐
(1)
tangibles

☐
(2)
intangibles

K.
Interests in partnerships investing in:

☐
(1)
real estate

☐
(2)
oil and gas interests

☐
(3)
other (explain on Schedule F)

☐
L.
Other (explain on Schedule F)

4.
Methods of Analysis, Sources of Information, and Investment Strategies.

A.
Applicant's security analysis methods include: (check those that apply)

(1)
☐
Charting

(2)
☒
Fundamental

(3)
☐
Technical

(4)
☐
Cyclical

(5)
☐
Other (explain on Schedule F)

B.
The main sources of information applicant uses include: (check those that apply)

(1)
☒
Financial newspapers and magazines

(2)
☒
Inspections of corporate activities

(3)
☒
Research materials prepared by others

(4)
☒
Corporate rating services

(5)
☐
Timing services

(6)
☒
Annual reports, prospectuses, filings with the Securities and Exchange Commission

(7)
☒
Company press releases

(8)
☐
Other (explain on Schedule F)

C.
The investment strategies used to implement any investment advice given to clients include: (check those that apply)

(1)
☒
Long term purchases  
(securities held at least a year)

(2)
☐
Short term purchases  
(securities sold within a year)

(3)
☐
Trading (securities sold within 30 days)

(4)
☐
Short sales

(5)
☐
Margin transactions

(6)
☐
Option writing, including covered options, uncovered options, or spreading strategies

(7)
☐
Other (explain on Schedule F)

**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? ..... Yes No  
☐ ☒

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| ● name          | ● formal education after high school               |
| ● year of birth | ● business background for the preceding five years |

**7. Other Business Activities.** (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |   |
|--|---|
| <input type="checkbox"/> (1) broker-dealer<br><input type="checkbox"/> (2) investment company<br><input type="checkbox"/> (3) other investment adviser<br><input type="checkbox"/> (4) financial planning firm<br><input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant<br><input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (7) accounting firm<br><input type="checkbox"/> (8) law firm<br><input type="checkbox"/> (9) insurance company or agency<br><input type="checkbox"/> (10) pension consultant<br><input type="checkbox"/> (11) real estate broker or dealer<br><input type="checkbox"/> (12) entity that creates or packages limited partnerships |
|--|---|

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? ..... Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.**
- Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services
- and*
- impose a minimum dollar value of assets or other conditions for starting or maintaining an account? .....

Yes No  
☒ ☐

(If yes, describe on Schedule F.)

- 11. Review of Accounts.**
- If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Partners and Associates review accounts, either individually or collectively. When an individual Partner or Associate reviews an account and wants to make changes, he/she presents their recommendations to the collective group of Partners/Associates, which acts an investment committee. The investment committee generally meets daily. Accounts are not assigned to individual Partners/Associates; all Partners/Associates work on all accounts. The frequency of review varies. Cash is reviewed frequently. Quarterly valuations are reviewed by the Partners/Associates. The stocks owned by our clients are reviewed whenever earnings or significant news is announced. Significant changes in stock prices will also trigger a review. An account is reviewed whenever there is a significant change in the client's personal/economic situation. Various other circumstances also result in reviews of accounts.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Reports recieved by clients include quarterly market valuations, broker confirmations of transactions, monthly broker or custodian statements and year end listings of capital gains and losses.

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |                                     |                          |
|--|-------------------------------------|--------------------------|
|  | Yes                                 | No                       |
| (1) securities to be bought or sold? .....               | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? ..... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? .....                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? .....                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ..... ☒ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... ☐ Yes ☒ No
- B. directly or indirectly compensates any person for client referrals? ..... ☐ Yes ☒ No

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
  - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? ..... ☐ Yes ☒ No

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV**  
**Schedule D**  
**Page 1 of 5**

Your Name: Stewart and Patten Co., LLC

SEC File No.: 801-55172

Date: 5/5/2009

CRD No.: 109235

Certain items in Part 1A of Form ADV require additional information on Schedule D. Use this Schedule D Page 1 to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

This is an ☐ INITIAL or ☒ AMENDED Schedule D Page 1.

**SECTION 1.B. Other Business Names**

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D for each business name.

Check only one box: ☐ Add ☐ Delete ☐ Amend

Name \_\_\_\_\_ Jurisdictions \_\_\_\_\_

**SECTION 1.F. Other Offices**

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Page 1 for each location. If you are applying for registration, or are registered, only with the SEC, list only the largest five (in terms of numbers of employees).

Check only one box: ☐ Add ☐ Delete

\_\_\_\_\_  
(number and street)

\_\_\_\_\_  
(city)

\_\_\_\_\_  
(state/country)

\_\_\_\_\_  
(zip+4/postal code)

If this address is a private residence, check this box: ☐

\_\_\_\_\_  
(area code)

\_\_\_\_\_  
(telephone number)

\_\_\_\_\_  
(area code)

\_\_\_\_\_  
(facsimile number)

**SECTION 1.I. World Wide Web Site Addresses**

List your World Wide Web site addresses. You must complete a separate Schedule D for each World Wide Web site address.

Check only one box: ☒ Add ☐ Delete

World Wide Web Site Address: www.stewartandpatten.com

**SECTION 1.K. Location of Books and Records**

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D Page 1 for each location.

Check only one box: ☒ Add ☐ Delete ☐ Amend

Name of entity where books and records are kept: DATASAFE

**574 Eccles Avenue**

\_\_\_\_\_  
(number and street)

**South San Francisco**

**CA**

**94080**

\_\_\_\_\_  
(city)

\_\_\_\_\_  
(state/country)

\_\_\_\_\_  
(zip+4/postal code)

If this address is a private residence, check this box: ☐

**650-875-3700**

**650-875-7495**

\_\_\_\_\_  
(area code)

\_\_\_\_\_  
(telephone number)

\_\_\_\_\_  
(area code)

\_\_\_\_\_  
(facsimile number)

This is (check one):  
☐ one of your branch offices or affiliates.  
☒ a third-party unaffiliated recordkeeper.  
☐ other.

Briefly describe the books and records kept at this location.

**A limited number of historical records related to legacy firm Shuman & Schneider**

**FORM ADV**  
**Schedule D**  
**Page 5 of 5**

Your Name: Stewart and Patten Co., LLC

SEC File No.: 801-55172

Date: 5/5/2009

CRD No.: 109235

Use this Schedule D Page 5 to report details for items listed below. Report only new information or changes/updates to previously submitted information. Do not repeat previously submitted information.

This is an ☐ INITIAL or ☐ AMENDED Schedule D Page 5.

Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

ALTHOUGH BLOCKS A.(1)AND A.(2)UNDER ITEM 9 ON THIS ADV PART 1 ARE CHECKED "YES", IT IS ONLY BECAUSE PRINCIPALS OF THE FIRM ACT AS A TRUSTEE FOR A LIMITED NUMBER OF CLIENT ACCOUNTS. IN EACH CASE THESE TRUSTS ARE HELD BY A QUALIFIED CUSTODIAN. CO-TRUSTEES AND/OR BENEFICIARIES OF THE TRUST RECEIVE ALL CUSTODIAL REPORTS, QUARTERLY REPORTS FROM STEWART AND PATTEN, AND ANNUAL PRINCIPAL/INCOME ACCOUNTINGS FROM STEWART AND PATTEN. THE NUMBER OF ACCOUNTS THAT FALL INTO THIS CATEGORY ARE 21 AND HAVE A TOTAL VALUE OF \$12,504,659 AS OF 3/31/2009. STEWART AND PATTEN DOES NOT HAVE CUSTODY OF SECURITIES OR CASH FOR ANY OTHER CLIENTS.



(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Stewart and Patten Co., LLC		IRS Empl. Ident. No.: 94-1611234
Item of Form (identify)	Answer	
Part II 1 (D)	<p>Our business consists of managing security accounts for which each client chooses a bank or broker as custodian. We hold a limited power of attorney which authorizes us to buy or sell securities. Occasional consultations are held with clients to discuss general matters such as income, safety, and how these related to the clients' other assets and requirements. We do not consult prior to individual security purchases and sales. Annual fees are based on the aggregate valuation for accounts as follows:</p> <p>0.75 of 1% on the first \$ 5,000,000 valuation; 0.60 of 1% on the next 5,000,000 valuation; and 0.40 of 1% on amounts over \$10,000,000 in valuation.</p> <p>The foregoing schedule pertains to a balanced investment account where a substantial portion of the account is invested in both equities and fixed income assets. The rate schedule would be increased by .25% of 1% at each level for an all equity account. Occasionally, fees are negotiated lower than the schedule shown above. These fees are computed twice a year based on the value of the five month average account balances for the periods ending April 30 and October 31. Bills are prepared during the months of May and November, and mailed to clients on approximately June 1 and December 1. On rare occasions, we purchase mutual funds on behalf os clients or hold mutual funds from legacy managers in clients' accounts. In this circumstance, the client may be charged mutual fund fees in addition to Stewart and Patten fees.</p> <p>On May 1, 2007, Edward J. Schneider, III, CFA, joined Stewart and Patten as a Principal of the Firm. Simultaneously, most clients from Mr. Schneider's predecessor firm – Shuman and Schneider – became clients of Stewart and Patten. In each case, these new clients assigned their existing investment management contract in writing to Stewart and Patten. Further assignment of these contracts is not anticipated and cannot occur without the written consent of the client. Over time, new agreements will be prepared and mutually agreed upon by these clients and Stewart and Patten. Mr. Schneider brought with him client relationships where fees are calculated and paid differently from traditional Stewart and Patten accounts.</p> <p>Many of these clients whose accounts have been under Mr. Schneider's management for some time are paying lower rates based on prior fee schedules. In addition, fees are sometimes established at lower levels when special circumstances justify such reductions. For accounts that have come to Stewart and Patten with Mr. Schneider, fees are based on the market value of supervised assets at the beginning of each three-month reporting period and are payable in advance.</p>	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Stewart and Patten Co., LLC		IRS Empl. Ident. No.: 94-1611234
Item of Form (identify)	Answer	
Part II 10	Minimum dollar valuation for starting an account is \$750,000. Under special circumstances, smaller accounts are occasionally accepted. We believe these fees are similar to those charged by many other investment counseling firms for similar services; however,comparable service may be available other sources for lower fees.	
Part II 6	<p>Principals -</p> <p>RONALD S. PATTEN (05/24/32) BA Occidental College; MBA Stanford University; Member / Principal, Stewart &amp; Patten Co., LLC; Partner - Stewart &amp; Patten Company. Entered the investment management business in1962 with the late Jack Stewart.</p> <p>GLEB BELONOGOFF (01/16/37) BS San Francisco State College; Retired CPA; Member / Principal, Stewart &amp; Patten Co., LLC; Partner- Stewart &amp; Patten Company. Joined Stewart and Patten in 1973.</p> <p>STEPHEN A. ETHRIDGE (03/06/59) BPA. Univ. of Mississippi; MBA. University of Colorado; Active Duty U.S. Naval Officer 1981-1988; Spare, Kaplan &amp; Bischel, Investment Advisors 1988-1991; BTR Capital Management 1991-1993; Retired from the U.S. Navy in 2005 at the rank of Captain after 24 years of active and reserve service. Joined Stewart &amp; Patten Co., LLC in July 1993.</p> <p>ROBERT M. GENTRY, CFA (03/11/62) BS Univ of Calif. at Davis; MS St. Mary's College; Assoc. - Stewart &amp; Patten Co., LLC; CFO - Intermax Solutions Inc.; CFO - DBSS Inc.; Controller - CR-P Associates, Inc. Joined Stewart and Patten in 1997.</p> <p>LORI E. SHERMAN, CPA (04-11-64) B.S. California State Polytechnic University, Pomona; CPA with Coopers &amp; Lybrand 1986-1990; Financial Consultant, 1991-1993; Vice President &amp; Controller - Roger Engermann &amp; Associates 1993-2000.; Joined Stewart and Patten in 2000.</p>	
Part II 9 (E)	Partners and associates occasionally buy or sell securities bought or sold for clients. Partners/associates are required to conduct all aspects of their personal business in such a manner to avoid any actual or potential conflict of interest. Partners/associates are prohibited from placing personal trades for securities when there are open client orders for that security. This effectively means that all trades for partners/associates take place at the end the day after all client trades have been completed. The one exception would be periods when the firm makes a series of transactions in a given security for client accounts over a period of several days. In this case, no personal trades in this security would be allowed until after all client transactions are complete. The company maintains a file (updated quarterly) on all partners' and associates' transactions involving the	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Stewart and Patten Co., LLC		IRS Empl. Ident. No.: 94-1611234
Item of Form (identify)	Answer	
Part II 12(A) 12(B)	<p>purchase and sale of equity securities.</p> <p>Clients usually select their own broker/custodian. We have made arrangements with several major securities firms for brokerage and custody at commission rates lower than regular "full service" brokerage accounts. On occasion, we help clients choose from one of these alternatives if they have no other preference. Our written Investment Management Agreement with our clients grants us authority to negotiate lower commissions, and we have done so wherever possible. In a limited number of circumstances, we execute trades at a broker other than the client's custodian solely to improve order pricing/execution. A few brokers voluntarily send us research reports; however, this is not a factor in our placement of what little discretionary business we have, nor is it a factor in our negotiating lower commissions. We do most of our research ourselves and it applies to all our clients.</p> <p>We occasionally execute block trades with different brokers due to the fact that client assets are held at different brokers as directed by clients. We will purchase or sell a security as one block through a selected broker and then allocate that trade among the clients that have selected that broker as their custodian. We then repeat that process for clients who have selected other brokers until the total transaction has been completed for all clients. Although price and transaction costs may vary slightly from broker to broker, within each group of clients who share the same broker, average share price and transactions costs are shared on a pro rata basis. Orders are placed with the small number of retail brokers utilized by some clients first in order to ensure that a connection is made with the broker during the trading day. All other brokers are traded on-line. The sequence in which block trades are placed with each broker group varies based on the size of the order and the liquidity of the security in the marketplace.</p>	