

## Item 1 Cover Page

Part 2A of Form ADV

Firm Brochure

Stewardship Advisory Group, LLC

885 Sedalia Street, Suite 102

Ocoee, FL 34761

Phone: (407) 470-1405

Date: February 22, 2013

[www.stewardshipadvisory.com](http://www.stewardshipadvisory.com)

This brochure provides information about the qualifications and business practices of Stewardship Advisory Group, LLC. If you have any questions about the contents of this brochure, please contact us at (407) 470-1405 or via email at [Jeff@StewardshipAdvisory.com](mailto:Jeff@StewardshipAdvisory.com). 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 Stewardship Advisory Group, LLC. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Please note that registration as an investment advisory firm does not imply a certain level of skill or training.

## **Item 2      Material Changes**

There are no material changes as this is Stewardship Advisory Group, LLC's first filing.

## Table of Contents

Item 1	Cover Page .....	1
Item 2	Material Changes .....	2
Item 4	Advisory Business.....	4
Item 5	Fees and Compensation.....	8
Item 6	Performance-Based Fees and Side-by-Side Management.....	12
Item 7	Types of Clients .....	12
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss .....	12
Item 9	Disciplinary Information.....	13
Item 10	Other Financial Industry Activities and Affiliations.....	13
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	14
Item 12	Brokerage Practices .....	14
Item 13	Review of Accounts.....	16
Item 14	Client Referrals and Other Compensation .....	16
Item 15	Custody .....	16
Item 16	Investment Discretion.....	16
Item 17	Voting Client Securities .....	16
Item 18	Financial Information .....	16

## Item 4      **Advisory Business**

### About the Firm

Stewardship Advisory Group, LLC is a registered investment adviser located in Ocoee, Florida. We began offering our services in January 2013. Our owner is Jeff Rogers, CLSA™, CEP®.

### Description of Advisory Services

Our services include fee-based *Life ♥Stewardship Coaching™*, Comprehensive Wealth Management and Consultation Services, Investment Management services, and the Referral to Third Party Investment Managers. We also provide presentations on general topics such as Stewardship and Wealth Management, Investing and the aspects of Planned Giving through Seminars and Educational Workshops.

When providing individualized services, we will review your present financial situation, goals, objectives, time horizons and other aspects affecting your overall financial needs. We will advise you on your present situation and how it affects your total wealth management goals, track progress towards short-term goals and how they relate to your long-range goals and objectives.

We also provide information and guidance on *Life ♥Stewardship Coaching™*, Family Legacy, Business Legacy and Wealth Management issues for the public and donors of Christian ministries and other Non-Profit Organizations.

Because *Life ♥Stewardship Coaching™* requires expert counsel in the Legal, Tax and Financial disciplines, we work collaboratively with our client's Estate Planning Attorney, Tax Professional or other Professional Advisors. We believe this Multi-Disciplinary approach creates additional value for our clients. Each of your other Professional Advisors will maintain their own professional independence and will charge you separate fees outlined in your Engagement Agreement with them.

### *Life ♥Stewardship Coaching™*

*Our Life ♥Stewardship Coaching™*, service helps guide you in assessing your current financial situation and allocating resources towards the fulfillment of your Family Legacy, Business Legacy, Charitable Legacy, Estate and Wealth transfer goals. It may include conducting a Stewardship Opportunity Summary™, the drafting of a Family Mission Statement and ethical wills, Family Retreats, Estate Design, and establishing various charitable giving vehicles as appropriate. We will provide ongoing monitoring, plan progress and implementation counsel related to achieving your long-term goals and objectives in these areas.

### *Comprehensive Wealth Management and Consultation Services*

We offer a variety of Wealth Management and Consultation Services. These services include a Retirement Planning Analysis, Investment Planning and Asset Allocation, Survivor Needs & Risk Management Analysis, Estate Plan Analysis, and Income Tax Analysis as well as Strategic and Tactical Tax Planning, Cash Flow Analysis & Spending Plan, Accumulation & Major Goals Funding and Financial Freedom and Debt Reduction Planning. Clients may select any combination of these services that is appropriate for their needs or may opt for a Comprehensive Plan that includes multiple modules.

- **RETIREMENT ANALYSIS**

From wise investment selection within your 401k and pension plans, to tax and change-of-lifestyle issues, our goal is to help you enter your golden years with greater clarity & confidence.

- **INVESTMENT PLANNING & ASSET ALLOCATION**

Are your investments performing the way you want them to? Do you have proper asset allocation and good diversification? Are your investments in alignment with your values? Our investment process will help you position your assets to meet your needs for growth and provide income to meet your objectives.

- **SURVIVOR NEEDS & RISK MANAGEMENT ANALYSIS (INCLUDING LIFE, DISABILITY & LONG TERM CARE INSURANCE EVALUATION)**

Insurance is the all-too-often missing piece of the financial plan, and one that can lead to a quick financial ruin. We will help you determine the right amount and best type of coverage, helping to prepare you for life's unfortunate events. Additionally, we can help you get the best value as you manage these risks.

- **ESTATE PLAN ANALYSIS**

For people with large estates, the IRS can take as much as 40% or more in Federal Estate and IRD Taxes. The good news is estate taxes can be reduced or even eliminated through proper planning. We have a high degree of expertise in **Zero Estate Tax Planning** and can assist you and your family in this important area.

- **COLLEGE EDUCATION PLANNING**

Your children or grandchildren may still be in diapers, but it is never too soon to begin planning for their education. The cost of a College Education has gotten much more expensive in recent years and the costs are expected to continue to increase. One of the greatest Blessings a parent or grandparent can give their loved ones is financial assistance in an education that will help them earn a living in the years to come (whether that is traditional college education, trade school, apprenticeship, etc.) How much do we need to invest to reach our goals? What type of investments should we use to fund education? Stewardship's team will help find the best plan for you and your family.

- **STRATEGIC AND TACTICAL TAX PLANNING**

As the late Supreme Court Justice, Learned Hand once said; ***"Anyone may arrange his affairs so that his taxes shall be as low as possible; he is not bound to choose that pattern which best pays the treasury. There is not even a patriotic duty to increase one's taxes."***

It's not what you make that counts, it's what you keep. This is true not only about your current income but also your future income from investments in your retirement or distribution years.

Most people make some critical and very costly strategic mistakes during their Accumulation years that cost them thousands of dollars in unnecessary Taxes during their Distribution years. Our Strategic and Tactical Tax Planning process can help you reduce or minimize your taxes!

- **CASH FLOW ANALYSIS AND SPENDING PLAN**

Many people, affluent or poor, don't have a good handle on where their money is going. For many, Proverbs 23:5 is true which says, "Money makes itself wings and flies away." Proverbs 27:23-24 gives the answer; "Be diligent to know the state of your flocks...for riches are not forever." Our Cash Flow Analysis can help you create a Spending Plan that will allow you to control your money instead of letting your money control you.

- **ACCUMULATION AND MAJOR GOALS FUNDING**

Do you have accumulation goals, dreams that you would like to save for? Do you want to "save first and pay later" to avoid getting into debt? That is how previous generations did it and many of us would be wise to "defer our gratification" and save the interest by wisely planning and saving for the accomplishment of our goals.

- **FINANCIAL FREEDOM AND DEBT REDUCTION PLANNING**

Many Americans have realized that they, like our government, need to "balance our budget". Many have come to realize that being in Financial Bondage is not the way we want to live. If you want to develop a Debt Reduction Plan and get on the Journey to True Financial Freedom, we can help you.

### *Investment Management Services*

We offer investment management services, defined as providing continuous advice to you or making investments for your individual needs.

We will survey you to determine your investment experience, liquidity requirements, and tolerance for risk, as well as for general financial information. Your written risk profile then guides our customized investment recommendations to help you achieve your goals.

You may instruct us to exclude certain securities on an individual basis or to impose reasonable restrictions on your accounts. We have a special expertise in helping clients align their investments in a Biblically Responsible or Morally Responsible manner.

In order for us to provide ongoing services, you are responsible to advise us, in writing, of changes in your financial status, modifications to your Account Objective, specific investment restrictions if applicable, special reports required if any, and material changes, such as a change of address or marital status.

Although the Principal of our firm, Jeff Rogers, has almost 30 years of financial services experience, as of today, Stewardship Advisory Group, LLC. has no assets under management, as this is our first Form ADV

filing. The Investment Advisory Representatives of Stewardship Advisory Group, LLC currently have over \$50 million of assets under management and are working to bring those assets to the firm.

You are obligated to contact Stewardship Advisory Group, LLC. promptly if there have been any changes in your current financial status information to determine if there needs to be a change in financial and investment objectives and/or strategies.

You may call the office at any time during normal business hours to discuss directly with an Advisory Representative of Stewardship Advisory Group, LLC., your account, financial situation or investment needs.

For investment clients, you will receive transaction statements as they may occur, and a quarterly statement of the account from the custodian or brokerage firm. Additionally, we may prepare a summary report or a wealth plan, depending upon the type of engagement and as you may request.

### *Referral to Third Party Managers*

We have entered agreements with leading third party money managers for professional management of client accounts. We will not refer you to a money manager unless the money manager is registered or exempt from registration as an investment advisor in your State of residence. You may select a recommended money manager based on your needs. We will be available to meet with you on a continuous basis.

Depending on your needs, we may design your portfolio through the use of a Multi-Manager Unified Managed Account (UMA) solution. The UMA allows your portfolio to be constructed using a dynamic asset allocation strategy that may incorporate multiple money managers who are specialists in their respective asset classes and who, in turn, purchase underlying investments on your part. A Multi-Manager UMA strategy provides for simplified investment management with excellent, easily readable performance and tax reporting.

We will receive a portion of the fee paid to the third party money manager through a solicitor's relationship, which is further detailed on the Solicitor's Disclosure Statement at the onset of your relationship with the third party money manager. The third party manager's services and the fees involved in these programs are described in the third party money manager's Form ADV Part 2.

### *Seminars and Educational Workshops*

We also provide information and guidance on *Life ♥ Stewardship Coaching™*, Estate Planning, Family Legacy and Wealth Management issues for the public and donors of Christian ministries and other Non-Profit Organizations. We are available to provide helpful information and assistance to financially successful families who are interested in using their financial blessings to help achieve their unique eternal purpose. Assistance includes reviewing various ways families may link their financial affairs with their Christian faith through optimizing stewardship or the empowerment of loved ones. Services may include discussions and planning of the ways families might wish to fulfill their desire to help their community, their church and the ministries that are near and dear to their hearts.

## Item 5 Fees and Compensation

### *Fees for Comprehensive Wealth Management and Consultation*

INDIVIDUAL MODULES	\$2,500	Retirement Planning Analysis
	\$1,000	Investment Analysis and Asset Allocation
	\$500 (\$100 per additional Child)	Survivor Needs and Risk Management Analysis <u>OR</u> College Education Analysis
	\$1,000	Estate Plan Review and Analysis
	\$1,000	Strategic & Tactical Planning
\$6,000		Combined Value of all Modules

\$4,000	<b>Comprehensive Plan</b> - Package including ALL of the above modules!
---------	----------------------------------------------------------------------------

OPTIONAL MODULES	\$500	Cash Flow Analysis and Spending Plan
	\$500	Accumulation and Major Goals Funding
	\$500	Financial Freedom and Debt Reduction Planning

Fees for Wealth Management and Consultation Services are agreed upon at the time of engagement and outlined in the Client Agreement or Engagement Letter. Fees under the *Wealth Management Consultation* program may be modified based upon individual circumstances, pre-existing relationships, complexity of services, value delivered or as otherwise may be determined at the discretion of the Adviser. Project fees are listed above.

Alternatively, we may perform services based upon the Firm's hourly rate of \$200 - \$450, depending



upon the complexities of services and agreed upon at the time of engagement. Fee payments are outlined in the Client Agreement. Depending upon the size and complexity of the engagement, fees may be due upon the delivery of services. Otherwise, fees may be payable in two payments, a retainer equal to one-half the proposed project fee with the balance due upon the delivery of services. We do not collect fees in advance for services to be performed over more than six months. Where travel or other expenditures are included in the delivery of services, we may invoice you. Any out-of-pocket expenses are outlined in the Client Agreement if applicable.

### ***Fees for Life ♥Stewardship Coaching™***

The Life ♥Stewardship Coaching™ services have a separate fee schedule and this is as follows:

	<i><b>Stewardship Opportunity Summary  Value Proposition Summary</b></i>	<i><b>Tactical Stewardship Plan  Single Technique or Tool</b></i>	<i><b>Strategic Stewardship Blueprint  Comprehensive Plan</b></i>
<i><b>Fee</b></i>	<i><b>\$ 3,500-\$5,000</b></i>	<i><b>Typically \$5,000-\$10,000</b></i>	<i><b>Customized based on Complexity, the Scope of the Engagement and Value Delivered</b></i>

Fees under the Life ♥Stewardship Coaching™ program may be modified based upon individual circumstances, pre-existing relationships, complexity of services, value delivered or as otherwise may be determined at the discretion of the Adviser. Advisory Fees are clearly outlined and agreed to in an Engagement Letter. Depending upon the size and complexity of the engagement, fees may be due upon the delivery of services. Otherwise, fees may be payable in two payments, a retainer equal to one-half the proposed project fee with the balance due upon the delivery of services. We do not collect fees in advance for services to be performed over more than six months. Where travel or other expenditures are included in the delivery of services, we may invoice you. Any out-of-pocket expenses are outlined in the Client Agreement if applicable.

### ***Fees for Investment Management***

All Investment Management fees are charged each calendar quarter, based upon the account value of the assets in the portfolio as of the last business day of the prior quarter. The fee schedule for these services is listed on the following page and will be customized based on the managers & strategies chosen. Fees may be charged in advance or in arrears. If you choose to cancel our services within five days of opening your account, you will receive a full refund of any prepaid fees. If you cancel our services anytime thereafter, you will either receive a pro-rata refund of any prepaid fees (if you have paid in advance) or you will be assessed a pro-rata fee for the length of time during the quarter that your account was under management prior to termination (if you have paid in arrears).

Upon receiving client's written authorization, fees will be automatically deducted from the account. Clients are provided a quarterly statement from the custodian of their assets reflecting the deduction of the advisory fee.

In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. The fees charged are calculated as described above and are not charged on the basis of a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

The client may make additions to or withdrawals from the account at any time. Withdrawals are subject to standard securities settlement rules and the creation of cash may take a few business days. The client must promptly notify us of any contributions or withdrawals as such may have an impact upon the management of the Account and may adversely affect the performance of the account.

FEE-BASED ASSET MANAGEMENT ACCOUNTS	Up to \$2 Million	1.25%
	\$2M-5M	.75%
	Above \$5M	.50%

- Based on Assets under Management in Fee-Based Accounts only
- Does Not Include Manager Fees or Custodial Fees; which will vary based on a number of factors, including the specific Managers selected, Strategy chosen and Account Size.
- Does include Ongoing Review of the Managers, Strategy and Rebalancing Issues.
- Also includes creation of a formal Investment Policy Statement, Monthly Investment Statements, Quarterly Performance Reporting for each Account, Periodic Review with the Client (no less than Annually)
- Fee Schedule subject to Change with 30 Days Notice

### *Fees for Referrals to Third Party Managers*

If you are interested in obtaining fee-based Asset Management Services, you will be referred to one or more Registered Investment Advisory Firms that provide such services. In certain cases, we will receive a referral fee when a referral secures an engagement for services. The fee received is based upon a percentage of assets under management. When we make a referral to the Client, we will deliver to the Client the Advisory Firm's disclosure brochure, a Solicitor's Disclosure Document, and any other disclosure documents as required by regulation.

### *Fees for Seminars and Educational Workshops*

We conduct Seminars and Educational Workshops, which may include presentations on Financial and Wealth Management, stewardship, and general investment-related issues. We may charge a fee for seminars or educational workshops and the fee and termination policy would be clearly outlined in the

invitation or offering. Attendees are under no obligation to do so, but are welcome to engage individualized services with us.

### ***Important Information about Fees***

The advisory fees outlined in this disclosure represent the fees for our services only. All fees paid to us for advisory services are separate from the fees and expenses charged to shareholders of mutual fund shares by mutual funds, or by the investment adviser managing the portfolios. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. No portion of such fees are payable to Stewardship Advisory Group, LLC. Clients are encouraged to read each fund prospectus.

You may also bear certain charges imposed by third parties other than Stewardship Advisory Group, LLC. in connections with investments made through their accounts, including but not limited to transaction fees to broker/dealers, servicing fees, 12b-1 distribution fees, sub-accounting fees and IRA and Qualified Retirement Plan fees. These fees will be passed on to you and may be higher than fees charged by other investment advisers for similar services.

In conjunction with the delivery of Wealth Management Services, we may work jointly with another Registered Investment Advisory Firm to facilitate the delivery of the services desired. We will deliver the other Advisory Firm's disclosure brochure. Additionally, full disclosure will be provided to you. You will also sign an agreement for the delivery of the agreed upon services.

Some of our investment advisor representatives hold insurance licenses and can offer life, health, disability and long-term care insurance. This creates a conflict of interest in that your Advisor may receive compensation for providing investment advice as well as for selling insurance products recommended by a financial plan. Clients are under no obligation to purchase any insurance products from any of our associates. If they do so, there will be compensation earned through the sale of the insurance product in addition to the advisory fees and this may create a conflict of interest.

### ***Termination***

You may terminate the Wealth Management, Consultation or *Life ♥Stewardship Coaching™* services Agreement within 5 business days of signature if our ADV Part 2 is not delivered to the Client at least 48 hours prior to engagement. Otherwise, you may terminate the Agreement upon written notice at any time. You will only be invoiced for time and effort incurred by the Adviser on the development of the Plan prior to termination at the Firm's hourly rate. The decision to bill is at our discretion. Otherwise, Financial Planning Services terminate upon delivery of the plan.

### ***Important Information about Potential Conflicts of Interest***

Your Investment Advisor is a Registered Representative of United Planners Financial Services, L.P. ("United Planners") and may provide brokerage services to clients in that capacity. United Planners' principal business is as a full service general securities broker/dealer registered with the Securities Exchange Commission, FINRA and various other regulatory bodies.

This presents a potential conflict of interest as it gives your Advisor an incentive to recommend investment or securities products based on the compensation received, rather than on your needs.

You have the option to purchase investment products that the advisory representative recommends through other brokers or agents not affiliated with our firm.

Lower fees for comparable services may be available from other sources.

There are additional potential conflicts that you should consider. Please review Item 10 of this document for more information.

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

We do not accept performance-based fees.

## **Item 7 Types of Clients**

We work with Individuals, trusts, estates, charities, foundations and other businesses.

We have no minimum level of assets under managements for clients who wish to work with us.

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

**For Life ♥Stewardship Coaching™**, we work collaboratively with your Estate Planning Attorney, Tax Professional, Ministry Development Officer, Family Coach and leading providers of advanced planning services to help bring our clients the best possible planning resources in order to reach their stewardship goals. We thoroughly analyze your BAL TIC data (Balance Sheet, Asset Management, Legal Documents, Tax Returns, Insurance and Cash Flows) and do a GAP Analysis comparing your goals to your Current Plan. We summarize this through a mini-engagement called your **Stewardship Opportunity Summary™**. This Analysis can help you clearly see our Value Proposition before deciding to engage us for the full Life ♥Stewardship Coaching™ process.

For Wealth Management and Investment Management, we analyze your investment objectives, risk tolerance, time horizon, tax situation, etc. and will recommend Investment Managers and Portfolio Allocations that we believe will help you to achieve your objectives.

We may utilize the following methods of security analysis:

Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)

Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)

Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

We also use research provided by third parties.

When we manage assets, we (or the advisors we select) use the following methods of investment management:

Long Term Purchases (securities held at least a year)

Short Term Purchases (securities sold within a year)

Trading (securities sold within thirty (30) days)

**Please Note: Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s).

Our primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional fees when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction fees when compared to a short term investment strategy and substantially higher transaction fees than a longer term investment strategy.

## **Item 9      Disciplinary Information**

During a routine audit by the State of Florida Department of Securities, it was discovered that our affiliate, Stewardship Legacy Coaching, had done a monthly client letter without having it approved by our broker/dealer's compliance department. Up until that time, we were unaware that communications from Stewardship Legacy Coaching had to be approved by the broker/dealer. Jeff Rogers, President of Stewardship Legacy Coaching, paid a fine of \$7,500 and signed a consent letter in September 2010.

## **Item 10      Other Financial Industry Activities and Affiliations**

Our advisory representatives are registered representatives offering securities through United Planners Financial Services of America ("United Planners"), a registered securities broker-dealer, member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Should clients implement recommendations through Advisory Representatives, Advisory Representatives may receive commissions in addition to the advisory fees. Commissions paid through United Planners may be higher or lower than at other broker/dealers. Additionally, account maintenance costs and transaction costs may be higher or lower at United Planners than at other broker/dealers. Clients are not obligated to implement recommendations through Advisory Representatives or through United Planners.

Many of our advisory representatives are also licensed insurance agents appointed with various insurance companies. As licensed insurance agents, our advisory representatives may offer investment advisory clients the option to purchase insurance products. If client purchases insurance products through our advisory representatives, he will receive commission and related compensation such as insurance trail fees as a result of the sale.

Jeff Rogers, CLSA™, CEP®, the President and Chief Compliance Officer of Stewardship Advisory Group, LLC, is a limited partner of a firm that has developed, The Timothy Plan, a registered investment company (mutual fund). Mr. Rogers may at times be a shareholder of a Timothy Plan mutual fund. Mr. Rogers may recommend investment in the Timothy Plan family of funds. This recommendation represents a potential conflict of interest because of Mr. Rogers' personal financial interest in these recommendations. You are never under any obligation to invest in the mutual fund.

Jeff Rogers, CLSA™, CEP®, is a member and the Chief Inspiration Officer of Stewardship Asset Management, LLC. Stewardship Asset Management, LLC offers investment supervisory services as a third party manager to customers. If Mr. Rogers or another Investment Advisor Representative suggests to clients that they use Stewardship Asset Management, LLC's services, he will receive compensation. This creates a potential conflict of interest. Clients receive a disclosure that clarifies any fees they are paying for investment advice by third party managers.

Mr. Rogers is also the President of Stewardship Legacy Coaching, LLC, an Investment Advisory Firm. Mr. Rogers intends to do no further business through Stewardship Legacy Coaching, LLC, and will be transitioning future business to Stewardship Advisory Group, LLC.

The Adviser strictly prohibits insider trading. The Adviser monitors and maintains records of access persons' securities transactions.

We have a position of public trust and it is the our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable. We place great value on ethical conduct. Stewardship Advisory Group, LLC. acknowledges its fiduciary obligation to advisory clients and will place your interests first and foremost . We make an effort to recommend securities and insurance products that are most appropriate for the client, without consideration of compensation arrangements.

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

Associated persons may buy or sell for their own accounts the same securities recommended to you. They may do so at the same time as they, or a related person, buy or sell the same securities for their own account. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to you. We request information about all of our associate's transactions and monitor them for any wrongdoing.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

We have adopted a Code of Ethics to instruct its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm and our personnel owe a duty of loyalty, fairness and good faith to their clients, and the obligation to adhere not only to the specific provisions of the code but also to the general principles that guide the Code. The Code covers a range of topics including general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code to any client or prospective Client upon request.

## **Item 12 Brokerage Practices**

Our advisory representatives are registered representatives of United Planners, which necessitates United Planners keep and maintain certain records and perform other compliance functions in relation to the advisory activities of Stewardship Advisory Group. These obligations require United Planners to coordinate with and have the cooperation of certain custodians and/or broker/dealers. Accordingly, United Planners has established a list of custodian or brokerage firms in which Stewardship Advisory Group client assets may be placed and our custodial choices are limited to that list.

### **The Custodian and Brokers We Use**

We do not maintain custody of your assets that we manage (although we may be deemed to have custody of your assets if you give us authority to withdraw fees from your account (*see Item 15 Custody, below*)). We typically request that our clients use TD Ameritrade Institutional (TD), a FINRA-registered broker-dealer, member SIPC, or Pershing Advisor Solutions, ("Custodians") as the qualified custodian. We are independently owned and operated and not affiliated with the Custodians. T he

Custodians will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we request that you use the Custodians as custodian/broker, you will decide whether to do so and open your account with the Custodians by entering into an account agreement directly with them. We do not have discretion to determine the custodian that you use. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at the Custodians, we can still use other brokers to execute trades for your account, as described in the next paragraph.

### **How We Select Brokers/Custodians**

We seek to select a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below (*see “Products and Services Available to Us from the Custodians”*)

### **Your Custody and Brokerage Fees**

Please consult the account opening paperwork for information about the specific fees charged to you by the Custodians.

### **Products and Services Available to Us from the Custodians**

The Custodians provide us and our clients with access to its institutional brokerage –trading, custody, reporting and related services – many of which are not typically available to the Custodians' retail customers. The Custodians also make available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. The Custodians' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Some of these services benefit you, some may not directly benefit you. Some of these services generally only benefit us.

We believe, however, that our selection of these custodians is in the best interests of our clients. It is primarily supported by the scope, quality and price of these services.

In placing its orders to purchase or sell securities in accounts, the firm does not engage in block trading. Because we do not engage in block trading, you may pay higher transaction costs overall.

### **Item 13      Review of Accounts**

We periodically review the securities in client accounts. The accounts are reviewed quarterly. Accounts are reviewed by the investment advisor representative assigned to each account.

We may provide additional written reports to clients. The content and frequency of these reports vary based upon the needs of the client and the type of the account. Clients also receive statements no less than quarterly from the custodian of their assets. Clients should review those custodial statements carefully.

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

We may enter into solicitor relationships with individuals ("Solicitors") who in turn offer our services to members of the public. Through these arrangements, we pay a cash referral fee to the Solicitor based upon a percentage of our advisory fee. The referral fee is paid pursuant to a written agreement and this information is disclosed to Clients prior to or at the time of entering into an investment advisory agreement.

### **Item 15      Custody**

We do not have custody of client assets. Your assets are held at a qualified custodian. That custodian will send you statements, no less than quarterly, regarding your investment accounts. Those statements should be reviewed carefully.

### **Item 16      Investment Discretion**

For its investment management clients, in most cases, Stewardship Advisory Group, LLC will request that you give the firm investment discretion. By signing our investment management agreement and accepting the terms of the discretion disclosed in that agreement, you will give us the ability to hire and fire managers, and/or to purchase and sell securities on your behalf without your prior consent.

### **Item 17      Voting Client Securities**

We do not vote proxies on your behalf. You retain that right unless you make other arrangements with the custodian of your assets. You will receive proxies or other solicitations directly from the custodian of your assets. You may contact us with questions about proxies.

### **Item 18      Financial Information**

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you.