

**Form ADV Part 2A - Firm Brochure**  
**Item 1: Cover Page**  
**May 2015**

**Steward Family Office, Inc.**  
**500 La Terraza Blvd., Suite 150**  
**Escondido, CA 92025**

**Firm Contact:**  
**Timothy Winter**

This brochure provides information about the qualifications and business practices of Steward Family Office, Inc. If you have any questions about the contents of this brochure, please contact us by telephone at (858) 263-1647 or email [tim@StewardFO.com](mailto:tim@StewardFO.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 Steward Family Office, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Please note that the use of the term "registered investment adviser" and description of Steward Family Office, Inc. and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

## **Item 2: Material Changes**

Steward Family Office, Inc. is required to advise you of any material changes to the Firm Brochure ("Brochure") from our last annual update.

As of March 2015, the firm is seeking to register with the California Department of Business Oversight.

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## Item 4: Advisory Business

We are dedicated to providing individuals and other types of clients with a wide array of financial consulting services to individuals, families, and their personal entities. Our firm is a corporation formed in the State of California. Our firm has been in business as an investment adviser since 2014 and is solely owned by Timothy Winter.

### Description of the Types of Advisory Services We Offer

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#### Financial Consulting:

We provide a variety of ongoing consulting services to families that have attained a net worth of \$25,000,000 or more regarding the management of their financial resources based upon an analysis of the client's current situation, goals, and objectives. As part of this service, we generally charge a minimum fee of \$20,000 on an annual basis for our financial consulting services. We equip clients with professional and administrative support, enabling families to focus their time and energy in meaningful pursuits. Consultations will be rendered based on the consulting areas that are selected in the Financial Consulting Agreement. Our consulting service may encompass one or more of the following areas:

- Balance Sheet Reporting
- Income and Expense Reporting
- Cash Flow Reporting
- Portfolio Performance Reporting
- Estate Plan Consulting
- Philanthropic Consulting
- Family Coordination
- Travel and Concierge services
- Family Business Entity Consulting
- Property and Casualty Insurance Coordination
- Assets Acquisition and Disposition Planning
- Private Equity Consulting

The financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations may be made that the clients create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. It should also be noted that we refer clients to an accountant, attorney or other specialist, as necessary for non-advisory related services. For financial consulting engagements, we usually do not provide our clients with a written summary of our observations and recommendations as the process is less formal, unless requested or provided as a reporting service. Consultations are completed in a timely manner, assuming that all the information and documents we request from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client.

Clients are responsible for placing and executing their own trades, either on their own or with another investment adviser. We provide continuous and periodic outside account monitoring.

Pursuant to California Code of Regulations Section 260.235.2, we must disclose that a conflict of interest may exist between our firm and our Financial Planning clients. Clients are under no obligation to act upon our recommendation and if the client elects to act on any of the recommendations, the client is under no obligation to effect investment related transactions through our firm.

### **Tailoring of Advisory Services**

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We offer general investment advice to clients utilizing our Financial Consulting service.

Since we do not manage client assets; clients do not have the ability to impose restrictions on investing in certain securities or types of securities.

### **Participation in Wrap Fee Programs**

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We do not offer wrap fee programs.

### **Regulatory Assets Under Management**

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Our firm does not have assets under management to report.

## **Item 5: Fees & Compensation**

### **How We Are Compensated for Our Advisory Services**

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#### **Financial Consulting:**

We charge on a flat fee basis for our financial consulting services. The total estimated fee, as well as the ultimate fee that we charge, is based on the number of areas that the client selects for consulting and the scope and complexity of our engagement. Flat fees are assessed per area of consulting and are generally within the following annual ranges:

- Balance Sheet Reporting: \$10,000 - \$30,000
- Income and Expense Reporting: \$10,000 - \$20,000
- Cash Flow Reporting: \$10,000 - \$30,000
- Portfolio Performance Reporting: \$20,000 - \$40,000
- Estate Plan Consulting: \$10,000 - \$25,000
- Philanthropic Consulting: \$10,000 - \$25,000
- Family Coordination: \$5,000 - \$20,000
- Travel and Concierge services: \$5,000 - \$10,000
- Family Business Entity Consulting: \$10,000 - \$30,000
- Property and Casualty Insurance Coordination: \$5,000 - \$15,000
- Assets Acquisition and Disposition Planning: \$5,000 - \$20,000
- Private Equity Consulting: \$10,000 - \$40,000

The total fee is divided into 4 quarterly payments that are charged in arrears. We do not require a retainer of the ultimate financial consulting fee. Fees are billed directly and due to us within thirty (30) days of the invoice being delivered.

While we believe our fees are reasonable in comparison to other Advisers, pursuant to the California Code of Regulations § 260.236j, we must note that lower fees for comparable services may be available from other sources.

### **Other Types of Fees & Expenses**

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Clients will not incur additional fees from our firm.

### **Termination & Refunds**

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If a client wishes to terminate our services, the client must contact us in writing and state that they wish to cancel our services. Upon receipt of the letter of termination, we will proceed to close out the service and charge the client a pro-rata fee(s) for services rendered up to the point of termination.

### **Commissionable Securities Sales**

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We do not sell securities for a commission.

## **Item 6: Performance-Based Fees & Side-By-Side Management**

We do not accept performance-based fees.

## **Item 7: Types of Clients & Account Requirements**

We have the following types of clients:

- High Net Worth Individuals;
- Trusts;
- Foundations;
- Personal Entities;
- Estates.

We generally charge a minimum fee of \$20,000 on an annual basis for our financial consulting services.

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

Our firm does not manage advisory accounts, therefore we do not analyze or implement any investment strategies.

### **Risk of Loss**

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Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

### **Item 9: Disciplinary Information**

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

### **Item 10: Other Financial Industry Activities & Affiliations**

Neither the Company nor any of our management persons are registered, or have an application pending to register as a broker-dealer or registered representative, futures commission merchant, commodity pool operator, commodity trading advisor or as an associated person of the foregoing entities, except as disclosed below.

In addition, neither the Company nor any of our management persons have any relationship or arrangement that is material to our advisory business or to our clients that we or any of our management persons have with any related person that is, under common control and ownership, a:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker,
- Investment company or other pooled investment vehicle,
- Other investment adviser or financial planner,
- Futures commission merchant (or commodity pool operator or commodity trading advisor),
- Banking or thrift institution,
- Accountant or accounting firm,
- Lawyer or law firm,
- Insurance company or agency,
- Pension consultant, or
- Real estate broker or dealer or
- Sponsor or syndicator of limited partnerships.

Our firm does not recommend or select other investment advisers for clients and receive compensation directly or indirectly from those advisers.

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

An investment adviser is considered a fiduciary and our firm has a fiduciary duty to all clients. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided upon request.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

Neither our firm nor a related person recommends to clients, or buys or sells for client accounts. Therefore, this eliminates a conflict of interest for our firm.

Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics.

### **Item 12: Brokerage Practices**

Since our firm does not manage assets, we do not maintain relationships with broker-dealers/custodians or recommend the use of any particular broker-dealer/custodian in regard to the safety and custody of securities.

### **Item 13: Review of Accounts or Financial Plans**

Our Financial Consulting service is offered on an ongoing basis. For financial consulting engagements, we usually do not provide our clients with a written summary of our observations and recommendations as the process is less formal, unless requested or provided as a reporting service. Our firm will meet with clients to discuss any changes in their financial situation.

We review client accounts on at least a quarterly basis as part of the portfolio monitoring portion of our service. Timothy Winter, Chief Compliance Officer will conduct reviews of client accounts. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc. Verbal reports to clients take place on an ongoing basis.

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

Our firm does not receive other forms of compensation besides what is disclosed in this brochure.

#### **Referral Fees**

We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940.



### **Item 15: Custody**

Clients will be invoiced directly for advisory fees and will not be deducted from advisory accounts.

It has been determined that our firm has custody of client funds in connection to the bill-paying services that we provide to our clients, where we are authorized to withdraw funds and/or have check writing authority in client bank accounts to pay for the client's expenses. In order to satisfy regulatory requirements, our firm will meet the Department of Business Oversight's minimum financial requirement and engage an independent certified public accountant to conduct an annual surprise examination that will be filed with the Department of Business Oversight.

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

Our firm will not maintain discretion over client securities.

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

We do not accept proxy authority to vote client securities.

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

We are not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than \$500 in fees and six or more months in advance.
- We do not take custody of client funds or securities.
- We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

We have never been the subject of a bankruptcy proceeding.

### **Item 19: Requirements for State-Registered Advisers**

**Timothy Winter**  
**Year of Birth:** 1978

#### **Educational Background:**

- 2002; Texas A&M University; Masters Degree in Finance
- 2000; Oklahoma Christian University; Bachelors Degree in Business Management

#### **Business Background:**

- 12/2014 – Present     Steward Family Office, LLC; Owner, Chief Compliance Officer, and Investment Adviser Representative
- 11/2006 – 11/2014     Merrill Lynch, Pierce, Fenner & Smith Inc., Vice President
- 03/2004 – 11/2006     Merrill Lynch Trust Company, FSB, Vice President

**Exams, Licenses & Other Professional Designations:**

- 10/2007 – Certified Financial Planner
- 02/2005 - Series 65

Per the California Code of Regulations Section 260.238(k), we must state that we have disclosed all material conflicts of interest relating to our firm, our representatives, and our employees that could be reasonably expected to impair the rendering of unbiased or objective advice.

We are not actively engaged in any other business other than giving investment advice nor do we charge performance-based fees. Our firm and management persons have not been involved in any arbitration awards, found liable in any civil, self-regulatory organization or administrative proceedings or have any relationships with issuers or securities apart from what is disclosed above.

Our firm does not have compensation arrangements connected with advisory services which are in addition to our advisory fees. Our management persons and representatives do not engage in other financial industry activities or affiliations. As a fiduciary, we always put our Client's interest above our own. Information regarding participation of interest in client transactions can be found in our Code of Ethics as well as Item 11 of this Brochure. You may obtain a copy of our Code of Ethics by contacting Timothy Winter, Chief Compliance Officer at (858) 263-1647.