



703 West 10th Street
Austin, TX 78701

(512) 469-9152
mstone@stoneasset.com
www.stoneasset.com

(Item 1)

March 2019

This brochure provides information about the qualifications and business practices of Stone Asset Management, Inc. If you have any questions about the contents of this brochure, please contact us at (512) 469-9152 or bmcgehee@stoneasset.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 Stone Asset Management, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes (Item 2)

The last annual update of this brochure was in March 2018. The following material changes have occurred since that filing:

- October 2018: Brittany McGehee named as Chief Compliance Officer.

Table of Contents (Item 3)

Advisory Business (Item 4)	1
Fees and Compensation (Item 5).....	3
Performance-Based Fees and Side-By-Side Management (Item 6).....	5
Types of Clients (Item 7)	5
Methods of Analysis, Investment Strategies and Risk of Loss (Item 8)	5
Disciplinary Information (Item 9)	6
Other Financial Industry Activities and Affiliations (Item 10).....	6
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading (Item 11).....	6
Brokerage Practices (Item 12)	7
Review of Accounts (Item 13)	9
Client Referrals and Other Compensation (Item 14).....	10
Custody (Item 15).....	10
Investment Discretion (Item 16)	10
Voting Client Securities (Item 17).....	10

ADVISORY BUSINESS (ITEM 4)

Advisory Firm Description

Stone Asset Management, Inc. (the “Firm” or “we” or “us”) has been in business as a registered investment advisor since late 2004. The sole owner is W. Morgan Stone, CFP®, MBA.

Types of Advisory Services

We provide our clients with a flexible array of services which can be tailored to meet a wide range of needs. Our goal is to assist clients as they identify and prioritize their financial goals, to set realistic expectations and implement a disciplined and prudent strategy to achieve those goals. Our range of services falls into the following three categories: investment management, hourly consulting/financial planning projects, comprehensive financial planning and our GuideTrack Service.

In each of these services, we accept no commissions for sales of product. We are paid directly by our clients and work in all ways to put our clients first.

Investment Management Service

Stone Asset Management, Inc. provides an Investment Management Service to its clients, which is available either in combination with, or separate from, its Financial Planning Service.

The Firm’s Investment Management service is comprised of:

- Assessing the client’s investment objective, time horizon and risk tolerance (which will have been determined if the client used our Financial Planning Service)
- Determining appropriate investment asset allocations
- Purchasing appropriate investments on behalf of the client through a limited power of attorney
- Monitoring and rebalancing investments on an ongoing basis according to each client’s requirements
- Reporting performance on a quarterly, annual and continuing basis
- Changing investments as appropriate to the client’s needs
- Making available financial planning services at a client’s request and at no additional charge: retirement and tax planning, insurance review, estate planning and/or educational needs analysis.

The Firm encourages all clients of its services to use qualified custodians which provide at least quarterly reports showing all portfolio holdings valued at period-end and a complete list of all transactions occurring in each account during the period, including the deduction of the management fee. All clients of the Firm’s Investment Management Service are required to use a qualified custodian.

Financial Planning Services

Comprehensive Financial Planning

The Firm provides sensible and unbiased financial planning solutions on a fee-only basis. The comprehensive planning process consists of the following steps:

- Initiate client meeting to determine scope of needs
- Establish a formal agreement between client and the Firm
- Client completes a questionnaire if required
- Gather additional required financial information, evaluate client's financial position, define and prioritize financial goals
- Present final plan to client
 - A Comprehensive Financial Plan may consist of:
 - Financial analysis of current position
 - Retirement Needs Analysis
 - Educational Funding Needs Analysis
 - Investment Planning Recommendations
 - Estate Planning Recommendations
 - Tax Planning Recommendations
 - Income and Asset Protection Recommendations

Planning Projects:

Our most commonly requested analyses are:

- Retirement and Investment Analysis
- Education Analysis
- Retirement & Education Analysis

Hourly Consulting

For those clients who are seeking help or advice on a specific issue or concern, we offer an hourly consulting service to address the client's specific needs.

For example, we have helped clients with:

- Preparing a second opinion on existing investment strategies
- Calculating savings goals
- Determining retirement savings distribution strategy
- Calculating the necessary funding for college and education
- Comparing Social Security claiming strategies
- Reviewing Roth IRA conversion options
- Expert witness testimony

Our consulting service is a good way to tap into our expertise about a specific matter for those clients who do not meet our investment asset minimum, or for those clients who prefer to manage their own investments.

GuideTrack Service

For those clients who have received a comprehensive financial plan, planning project or hourly consulting services we offer this service on a subscription basis as a way to assist Clients not yet requiring full investment management a way to continue his/her relationship with the Firm. Subscription levels are designed to meet clients' varying needs for assistance in setting up accounts, potential access to a limited investment model, and semi- or annual meetings. All subscribers receive online access to their personal financial plans, the ability to link accounts to the plan to measure progress toward goals, access to educational material and webinars, annual virtual meetings and email access to Firm personnel.

Tailored Advisory Services

The Agreement that most Investment Management Service clients enter into with the Firm provides that the client grants the Firm complete discretion to determine both the securities purchased and sold and the amounts of those purchases and sales. These trades are placed without obtaining prior permission from the clients. Clients have the ability to place restrictions on the Firm's discretion in writing.

Client Assets Under Management

At December 31, 2018, the Firm had \$169,066,050 of discretionary assets under management and \$1,393,131 non-discretionary for a total of \$170,459,181.

FEES AND COMPENSATION (ITEM 5)

Investment Management Service

Clients who choose the Firm's Investment Management Service, whether to implement their Financial Plan or separately, pay fees based on an annual percent of assets under management as valued by our third-party portfolio accounting system provider at the close of market on the last business day of each quarter. The Investment Management fee is charged when the account is fully funded or the Investment Policy Statement is completed. Fees are paid in advance, are deducted directly from a client's account only with the client's written permission as stated in Investment Management Agreement, and are charged at the rate of one quarter of the amount shown below each quarter. This fee includes financial planning services the Firm makes available to investment management clients.

<u>Assets under Management</u>	<u>Annual Fee</u>
First \$1,000,000	1.00% plus
\$1,000,001 to \$2,000,000	0.80% plus
\$2,000,001 to \$3,000,000	0.60% plus
Over \$3,000,000	0.50%

The Firm generally requires a minimum annual fee of \$4,000 to open an Investment Management account which translates to a minimum account size of \$400,000. This

minimum is waived in certain circumstance. For example, it may be waived in order to accommodate an account of an existing client's children who are minors. Because the minimum annual fee could result in fees being over 3% if the account(s) fall(s) below \$134,000, similar services may be found elsewhere for a lower fee. All fees are negotiable, and clients receiving the same services from the Firm may be paying higher fees. These Investment Management fees are separate from transaction, exchange, wire transfer, margin interest or account fees charged by the custodian. To the extent that client assets are invested in money market or mutual funds, our fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus which is provided by the account custodian. Some custodians charge transaction fees on some mutual funds, so that clients may be paying more to purchase or sell these funds than if the Firm went directly to these fund families on behalf of clients.

Financial Planning Services

Fees for financial planning services are not negotiable.

Comprehensive Financial Planning

Because each client's requirements for a financial plan vary both in terms of complexity of issues and his or her current financial position, plan fees vary significantly. Plan fees are determined by the Firm after the initial client meeting and are based on the estimated time to complete the plan as required at \$200/hour, with a minimum fee of \$4000. Each Planning Agreement shows exactly how much that client will pay for the plan as defined in the Scope of Services. Planning fees are due 50% at the execution of the Planning Agreement and 50% at the meeting when the final plan is presented to the client. The Plan is delivered to the client within 6 months of execution of the Planning Agreement.

A Comprehensive Financial Planning client may elect to implement the investment recommendations of the plan through the Firm's Investment Management Service or may elect to implement the plan elsewhere.

For those clients seeking updates of their Comprehensive Financial Plan as needed, we will do so at our then current hourly rates.

Planning Projects

Retirement and Investment Analysis--\$2000 payable in advance

Education Analysis--\$750 in advance

Retirement and Education Analysis--\$2500 in advance

Hourly Consulting

President	\$250/hour
Senior Financial Advisor	\$200/hour
Financial Advisor	\$100/hour
Client Service Associate	\$75/hour

We require an initial retainer depending on the complexity of the engagement in order to begin hourly consulting. Once the retainer has been exhausted, further hourly fees incurred will be due as invoiced in arrears on a monthly basis and/or the completion of the consulting service as defined in the Scope of Service.

Any fees for a Comprehensive Financial Plan, Planning Projects or Hourly Consulting will be credited against investment management fees for those clients who retain us to manage their assets on an ongoing basis within 90 days of plan or project document delivery, or on completion of the hourly consulting.

GuideTrack Services

Subscriptions are available for monthly fees of \$150 or \$250, depending upon the client's particular needs. Payment of these fees is made electronically through a third party service; at no time does the Firm have access to account or card information used for payment.

Use of Experts

On occasion the Firm may engage experts to assist with analysis of particular investments. These engagements will be made with client's prior permission. The Firm will notify client in advance if expert fees will be charged to the client.

Termination

Both the Investment Management and Financial Planning Service Agreements allow for termination by either party immediately upon receipt of written notice. GuideTrack Services may be terminated by the client at any time, and the Firm must give 30 days' written notice of termination to the client. Any prepaid unearned fees will be promptly returned to the client upon receipt of written termination notice, removal of the Firm as an authorized party or by transferring managed accounts elsewhere. Each Agreement provides that a client may terminate the agreement within five business days of its effective date without paying any fees or penalties to the Firm.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT (ITEM 6)

Stone Asset Management, Inc. does not receive performance-based fees so this does not apply.

TYPES OF CLIENTS (ITEM 7)

Stone Asset Management, Inc. provides investment advice to individuals and high net worth individuals.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS (ITEM 8)

Stone Asset Management, Inc. invests primarily in no-load mutual funds and exchange traded funds on behalf of its clients, and, as required, in individual equities and/or bonds. The Firm uses independent investment research that is not influenced by investment banking conflicts of interest. The Firm does not “time the market,” investing on what it expects the market to do in the short term. Instead, we invest for the long term by remaining committed to a disciplined rebalancing schedule. We expect our investment strategy to change for any individual client only when the circumstances and objectives of that individual change, rather than upon any temporary market fluctuations.

The Firm does not guarantee the future performance of the account or any specific level of performance, the performance of any investment decision or strategy that the Firm may use, or the performance of the Firm’s overall management of the account. The client understands that investment decisions the Firm makes for the account are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable. The Firm will manage only the securities, cash and other investments held in the client’s account. In making investment decisions for the account, the Firm will consider only the investments owned by the client which the client has disclosed to the Firm.

DISCIPLINARY INFORMATION (ITEM 9)

Stone Asset Management, Inc. has not incurred any legal or disciplinary events.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS (ITEM 10)

Stone Asset Management, Inc. is not affiliated with a broker-dealer and does not have any other financial industry activities or affiliations beyond its role as investment advisor.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING (ITEM 11)

Code of Ethics

Stone Asset Management, Inc. has adopted a Code of Ethics which describes the general standards of conduct that the Firm expects of all Firm personnel (collectively referred to as “employees”) and focuses on three specific areas where employee conduct has the potential to adversely affect the client: misuse of confidential information; personal securities trading and outside business activities. Failure to uphold the Code of Ethics may result in disciplinary sanctions, including termination with the Firm. Any client or prospective client may request a copy of the Firm’s Code of Ethics which will be provided at no cost.

The following basic principles guide all aspects of the Firm’s business and represent the minimum requirements to which the Firm expects employees to adhere:

- Clients' interests come before employees' personal interests and before the Firm's interests.
- The Firm must fully disclose all material facts about conflicts of which it is aware between the Firm and its employees' interests on the one hand and clients' on the other.
- Employees must operate on the Firm's behalf and on their own behalf consistently with the Firm's disclosures and to manage the impacts of those conflicts.
- The Firm and its employees must not take inappropriate advantage of their positions of trust with or responsibility to clients.
- The Firm and its employees must always comply with all applicable securities laws.

Misuse of Nonpublic Information

The Code of Ethics contains a policy against the use of nonpublic information in conducting business for the Firm. Employees may not convey nonpublic information nor depend upon it in placing personal or client securities trades.

Personal Securities Trading

To avoid conflicts of interest, Stone Asset Management, Inc. has established the following policies in order to ensure its fiduciary responsibilities:

- Trades in IPOs or private placements placed by employees in their accounts, family accounts or others over which they have trading authority, must be pre-cleared.
- No Stone employee shall place trades in any personal, family or other account over which he/she has trading authority based on knowledge of Stone Asset Management's investments unless the information is also available to the investing public on reasonable inquiry. No person associated with Stone Asset Management, Inc. shall prefer his or her own interest to that of any advisory client.
- Each employee must submit records of his or her personal securities trades to the Chief Compliance Officer at least quarterly, and securities holdings annually, for review to ensure that the employee is in compliance with the Firm's policies.

Outside Business Activities

Employees are required to report any outside business activities generating revenue. If any are deemed to be in conflict with clients, such conflicts will be fully disclosed or the employee will be directed to cease such activity.

BROKERAGE PRACTICES (ITEM 12)

Although the Firm recommends a broker-dealer to serve as custodian for our clients' accounts, each client must sign a separate agreement with the custodian. In recommending a custodian, Stone Asset Management, Inc. considers the range and quality of the products the custodian offers, the technical support provided, execution

quality, commission rates, the financial responsibility and responsiveness of the custodian to both the Firm and our clients. Stone Asset Management, Inc. currently requires TD Ameritrade Institutional as custodian for its client assets because of its discounted commission structure, quality of client service and access to mutual funds with no transaction fees. (Not all investment advisors require clients to use a specific custodian). Since TD Ameritrade Institutional charges a “trade away” fee every time a trade is placed with another broker-dealer, the Firm places all trades through TD Ameritrade. This practice may limit the Firm’s ability to attain best execution for each trade, but the Firm believes TD Ameritrade’s discounted commission structure is competitive.

Stone Asset Management, Inc. participates in the Institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services that include custody of securities, trade execution, clearance, and settlement of transactions. The Firm receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure below).

Research and Other Soft-Dollar Benefits

Stone Asset Management, Inc. periodically uses research information provided by broker-dealers and mutual funds with which we conduct business. However, the Firm does not have any formal or informal agreements to compensate broker-dealers or mutual fund companies for the receipt of such research information. The Firm, as a matter of practice, does not compensate any parties for third-party research services (known as “soft dollar arrangements”) with the use of client commissions; any payment required for such research will be made in cash.

As disclosed above, the Firm participates in TD Ameritrade’s institutional customer program and recommends TD Ameritrade to clients for custody and brokerage services. There is no direct link between our participation in the Program and the investment advice we give to our clients, although we receive economic benefits through our participation in the Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services which are provided without cost or at a discount:

- receipt of duplicate client statements and confirmations;
- research related products and tools;
- consulting services;
- access to a trading desk serving adviser participants;
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts);
- the ability to have advisory fees deducted directly from client accounts;
- access to an electronic communications network for client order entry and account information;

- access to mutual funds with no transaction fees and to certain institutional money managers; and
- discounts on compliance, marketing, research, technology, and practice management products or services provided to the Firm by third party vendors.

TD Ameritrade is a discount broker-dealer independent of and unaffiliated with the Firm and there is no employee or agency relationship between TD Ameritrade and the Firm. TD Ameritrade does not supervise us and has no responsibility for our management of client portfolios or our other advice or services to clients.

TD Ameritrade and various mutual fund providers have provided or paid for business consulting and professional services received by the Firm's related persons. Some of the products and services made available by TD Ameritrade (or mutual fund providers) through the Program benefit Stone Asset Management, Inc. but may not benefit its client accounts. These products or services assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade or mutual fund providers are intended to help us manage and further develop our business enterprise. The benefits received by the Firm or our personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by the Firm or its related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services or our choice to purchase certain mutual funds on behalf of clients.

Brokerage for Client Referrals

The Firm does not receive referrals from a broker-dealer or third party.

Directed Brokerage

Stone Asset Management, Inc. does not permit its clients to direct brokers through which the Firm must trade.

Order Aggregation

The Firm strives to treat all clients in a fair manner. Trades and all rebalancing efforts are conducted at the individual account level, so the Firm does not enact block trades, aggregating trades across clients.

REVIEW OF ACCOUNTS (ITEM 13)

Mr. Morgan Stone, President, and Ms. Kacie Swartz, Financial Advisor, review client accounts. All accounts are reviewed at least quarterly. Additional reviews may be triggered by such events as a change in a client's investment objectives or financial position, change in company or fund management, economic events, major company or fund news, etc.

In addition to statements provided by custodians, Stone Asset Management, Inc. provides reports to clients showing account holdings priced as of quarter-end with original cost basis and performance. An informational invoice is included with the quarterly portfolio reports.

CLIENT REFERRALS AND OTHER COMPENSATION (ITEM 14)

Stone Asset Management, Inc. does not pay outside parties for referring clients to us. The Firm receives no cash benefit, including commissions, from any party in connection with our clients' accounts. Some Firm personnel receive additional compensation based upon bringing new client relationships to the Firm. The Firm receives access to certain custodians' proprietary account management and data transmission services to enable the Firm to trade clients' accounts electronically. Custodians of our clients' accounts may also provide the Firm with educational and compliance material, such as newsletters and seminars to the Firm. Please see Brokerage Practices above for more information.

CUSTODY (ITEM 15)

Since the Firm is given authority by our clients to deduct our Investment Management fee, the SEC deems us to have a form of custody. (Custody is defined as the Firm's having any access to clients' cash or securities).

The Firm currently has custody of one client account due to a trustee relationship. This account is examined annually on a surprise basis by an outside public accounting firm.

When clients receive their account statements from the qualified custodian, they should carefully review those statements and take the time to compare them with those they receive from Stone Asset Management, Inc. If the client finds significant discrepancies, the custodian and Stone Asset Management, Inc. should be notified.

INVESTMENT DISCRETION (ITEM 16)

The Firm has full trading authority over client accounts under a limited power of attorney and the client will acknowledge and agree to this arrangement, as described in the Investment Management Agreement. Thus, the Firm will determine both the investments, and how much of each, should be purchased or sold on each client's behalf. Clients may place restrictions on the Firm's discretion in writing.

VOTING CLIENT SECURITIES (ITEM 17)

Stone Asset Management, Inc. does not vote client securities for its clients. Clients receive proxy material directly from their account custodian by either email or U.S. mail. Clients may address questions concerning a proxy matter to our personnel.