

Eagle Steward Wealth Management, LLC

Part 2A of Form ADV

The Brochure

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This brochure provides information about the qualifications and business practices of Eagle Steward Wealth Management, LLC (ESWM). If you have any questions about the contents of this brochure, please contact us at 585-218-9860. 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 ESWM is also available on the SEC's website at:
www.adviserinfo.sec.gov.

Material Changes

ESWM's most recent update to Part 2 of Form ADV was made in November 2010. ESWM's business activities have not changed materially since the time of that update. However, in 2010 the SEC required significant changes to the content and format of Part 2 of Form ADV. This brochure, which reflects those changes, is not materially different from brochures used by ESWM in prior years.

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Advisory Business

ESWM was founded in 2005 and is owned by William L. Tatro, IV. As of March 31, 2011 ESWM had \$0.00 assets under management and had approximately 0 clients.

Eagle Steward Wealth Management, LLC ("Adviser") engages in Financial Planning through a relationship with a client that begins with collecting pertinent data from the client via a written questionnaire completed by the client, study and analysis of the data, and preparation and presentation of a written financial plan of action designed to steer each client toward his or her expressed goals.

Eagle Steward Wealth Management does not conform to a particular investment strategy as defined by traditional investment theory. Client investment objectives are identified by assessing the client's risk tolerance, need for cash flows, investment goals, and emotional tolerance for volatility. The information provided by the client will be collected during client meetings and interviews. After analyzing a client's financial situation and formulating an investment strategy we implement the investment strategy through what we believe to be an optimal combination of investments. Capital market conditions and client circumstances are monitored and portfolio adjustments are made as appropriate to reflect significant changes in any or all of the above variables.

Fees and Compensation

ESWM offers Financial Planning services for an hourly fee based on its current standard rate of \$250.00 per hour. Such fees shall be mutually agreed upon by the client and ESWM, and shall be deducted directly from the client's account pursuant to a written agreement with the client. In lieu of an hourly fee, ESWM may elect to provide Financial Planning services on a fixed fee basis based upon a number of factors including the amount of work involved, the complexity of the client's financial circumstances and the attention needed to monitor the assets. Under no circumstances shall any planning fees exceed \$15,000.00.

In no circumstances will the Adviser require prepayment of more than \$500 in fees and six months or more in advance. Either the Adviser or the client may terminate the Financial Planning Agreement (the "Agreement") in writing in accordance with the termination provisions in the financial planning contract. A client may cancel the Agreement and receive a full refund if Adviser is notified within five business days after signing and agreement. If cancellation occurs thereafter, the client is responsible only for expenses incurred to that point. In such an event, an itemized invoice will be provided documenting the expenses that have been incurred.

Clients should be aware of their responsibility to verify the accuracy of the fee calculation submitted to the custodian by the Adviser, as the custodian will not determine whether the fee has been properly calculated. The fees charged by the Adviser are exclusive of all custodial costs paid to custodians, brokers or any other third parties.

Clients should review all fees charged by the Adviser, custodians, brokers and others to fully understand the total amount of the fees incurred.

Performance Based Fees and Side-by-Side Management

ESWM does not charge any performance fees. Some investment advisers experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures. However, these conflicts of interest are not applicable to ESWM.

Types of Clients

Adviser provides investment advice to individuals, trusts, estates, charitable organizations, pension & profit sharing plans, corporations or business entities other than those listed above.

Generally the minimum dollar value of assets required to establish an Investment Management Account is \$100,000. However, the Adviser has discretion to waive the account minimum. Accounts of less than \$100,000 may be established when the client and Adviser anticipate the client will add additional funds in the account bringing the total to \$100,000 within a reasonable period of time. All account registrations are cumulative for meeting the account minimum. Other exceptions will apply to employees of the Adviser and their relatives, or relatives of existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Adviser will often use behavioral economics as a method of security and market analysis, including recognizing that traditional Modern Portfolio Theory and Buy and Hold methodology may no longer be the sole investment strategies to be employed in order to deliver superior investment results. Adviser will utilize, in addition to other sources, fundamental, technical, cyclical and historical analysis. In addition, Adviser, may at times, utilize day trading, swing trading and trend trading within the context of those assets so designated by the Adviser for those trading methods. If client decides to proceed with Adviser's plan client needs to be aware that investing in securities involves risk of loss that clients should be prepared to bear.

In most instances, tax implications do not enter into trading decisions.

Periodic redeployment of assets within certain investments may occur if economic, political or financial circumstances so dictate. Such redeployment includes, but is not limited to, money markets, fixed income, commodities, indexes, and sectors.

Disciplinary Information

Adviser and its employee has not been involved in any legal or disciplinary events in the past 10 years that would be material to a client's evaluation of the company or its personnel.

Other Financial Industry Activities and Affiliations

Mr. Tatro is also licensed as an insurance agent with multiple insurance companies. Mr. Tatro may receive commission based compensation on insurance products purchased by clients. As a result, a potential conflict of interest may exist with Advisory clients' interests.

Mr. Tatro is the host for a radio program called "It's All About Money" that is broadcasted Monday through Friday in the market areas of Arizona, southern New York and northern Pennsylvania. The program discusses financial, political and geo-political issues. Investment advice is not disseminated during the program broadcast. On occasion, Mr. Tatro is invited to speak on various economic issues by companies that have heard him during his radio program. Mr. Tatro is compensated for these speaking engagements

Mr. Tatro is the sole Managing Member of an affiliated investment adviser, Biltmore Wealth Advisers, LLC, ("BWA"). BWA and Adviser are under common control. The investment advice provided to clients of BWA may be similar to the advice provided to clients of Adviser. However, Adviser is not obligated to acquire, for any account, any security that Adviser believes in its absolute discretion is not practical or desirable to acquire for the accounts of clients of Adviser.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

ESWM has adopted a written code of ethics adopted pursuant to SEC rule 204A-1 that is applicable to all employees. Among other things, the code requires Eagle Steward Wealth Management and its employees to act in the clients' best interests, abide by all applicable regulations, avoid even the appearance of insider trading, and pre-clear and report on many types of personal securities transactions. Eagle Steward Wealth Management restrictions on personal securities trading apply to employees, as well as employees' family members living in the same household. A copy of ESWM's code of ethics is available upon request.

ESWM's employees are generally permitted to trade alongside client accounts as long as they receive the average price that is applicable to clients and pay their share of any transaction costs. However, no employees are allowed to participate in partially filled orders until all clients' orders have been filled. The Chief Compliance Officer monitors employee trading, relative to client trading, to ensure that employees do not engage in improper transactions.

Eagle Steward Wealth Management maintains a watch list of securities that may be considered for client planning, as well as securities already held in client accounts. Any proposed employee transaction involving securities on the watch list requires preclearance from the Chief Compliance Officer. The Chief Compliance Officer does not grant preclearance where it would appear that an employee's trading could disadvantage ESWM's clients.

Under certain circumstances an employee might invest in a security that is not considered suitable for client accounts because of size, liquidity, or other factors. A change in these factors could result in the security becoming more suitable for clients, but the Chief Compliance Officer might not allow the security to be purchased for client accounts in order to avoid even the appearance of employees trading ahead of clients. In ESWM experience, it is rare for an employee's personal trading to limit clients' investment opportunities, but such a situation may arise from time to time.

Adviser may recommend that clients invest in the securities of companies that may sponsor Mr. Tatro's radio program, "It's All About Money". This will create a conflict between the interests of the Adviser and the interests of the client. To address these conflicts, it is the Adviser's policy to, (i) inform the client of the existence of the conflict of interest, (ii) only make such a recommendation if it is within the client's investment objectives and guidelines, and (iii) to ensure that the recommendation is in the best interest of the client. The client is under no obligation to purchase any securities recommended by the Adviser.

Adviser and its employees may buy and sell the same securities that may be recommended to clients. If the possibility of a conflict of interest occurs, the client's interest will prevail. It is the policy of Adviser that priority will always be given to the client's orders over the orders of an employee of the Adviser.

To avoid any potential conflicts of interest involving personal trades, the Adviser has adopted a Securities Compliance Policy ("Securities Compliance Policy"), which includes a formal code of ethics and insider trading policies and procedures. Adviser's Securities Compliance Policy requires, among other things, that Employees:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets;
- Place the integrity of the investment profession, the interests of clients, and the interests of Registrant above one's own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential conflict of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities;
- Practice, and encourage others to practice, in a professional and ethical manner that will reflect credit on yourself and the profession;
- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve your professional competence and strive to maintain and improve the competence of other investment professionals.

- Comply with applicable provisions of the federal securities laws.

Adviser's Securities Compliance Policy also requires Employees to: 1) pre-clear certain personal securities transactions, 2) report personal securities transactions on at least a quarterly basis, and 3) provide the Adviser with a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) over which such Employees have a direct or indirect beneficial interest.

A copy of Adviser's Securities Compliance Policy shall be provided to any client or prospective client upon request.

Brokerage Practices

Adviser generally recommends that clients implement its investment recommendations through a custodian of their choice. Adviser may recommend that they implement their investments through Ms. Caprice Mallett, as their broker, except in providing consulting services to the client's 401K or similar plan, wherein the plan custodian will normally serve as broker dealer. The Adviser's Managing Member, Mr. William Tatro, and Ms. Mallett worked closely together for a number of years and both share the same investment philosophy which could be a benefit to Adviser's clients.

A significant conflict may exist between the interests of Adviser and those of its clients as the Adviser's Managing Member, Mr. William Tatro, has a family relationship with Ms. Mallett. Consequently, Mr. Tatro stands to benefit economically from transactions placed through Ms. Mallett. Additionally, the execution costs associated with transactions may be more than clients might otherwise pay at other brokers.

Adviser does not receive any soft dollar benefits.

The Selection of Trading Counterparties

ESWM's approach is generally to trade stocks, mutual funds, and ETFs with the chosen custodian, and to trade bonds with the dealer that offers sufficient liquidity and the most favorable pricing.

Some clients' accounts are relatively small, in which case the custodian may not allow ESWM to trade through other firms. Other clients may specifically request that their accounts only be traded through a particular broker/dealer. ESWM trades these accounts through the firm chosen by the client, which limits ESWM's ability to seek best execution. Trading restrictions may result in materially higher trading costs and reduced returns.

Best Execution Reviews

On at least an annual basis ESWM's Chief Compliance Officer evaluates the pricing and services offered by the client's chosen custodian and other trading counterparties with

those offered by other reputable firms. ESWM has sought to make a good-faith determination that the client's chosen custodian and other chosen trading counterparties provide clients with good services at competitive prices. However, clients should be aware that this determination could have been influenced by ESWM's receipt of products and services. ESWM would notify its clients if it were to determine that another firm offered better pricing and services than their chosen custodian.

Aggregated Trades

ESWM typically aggregates client trades in an effort to treat all clients fairly. Clients participating in a bunched order receive the same average price and incur trading costs that are the same as would be paid if they were trading individually. Employees may be included side-by-side in bunched client trades. If an order is partially filled, clients will have their orders fully filled on a randomized basis; ESWM will seek to complete any unfilled client orders on the next trading day. Employees are excluded from bunched trades whenever client orders are only partially filled.

Client Referrals

ESWM does not compensate any custodian or broker/dealer for referring client accounts.

Review of Accounts

Generally, client accounts will be reviewed on a quarterly basis by William L. Tatro, IV, CFP, Managing Member. Market conditions, pricing, and overall performance are areas that are monitored. Market fluctuations, changes in the client's financial circumstances, or changes in a company's fundamentals, etc. may trigger a review.

Clients receive account statements directly from their chosen custodian on at least a quarterly basis. ESWM may supplement these custodial statements with reports provided during client meetings or as requested.

Financial retirement plans are reviewed based on client request or notification to Adviser of a significant change in the client's circumstance. All financial retirement plan reviews are conducted by William L. Tatro, IV, CFP and there is no limit as to how many financial plans are reviewed.

Client Referrals and Other Compensation

ESWM does not receive any economic benefits from non-clients in connection with the provision of investment advice to clients.

Custody

All clients' accounts are held in custody by unaffiliated broker/dealers or banks, but ESWM can access many clients' accounts through its ability to debit planning fees. For this reason ESWM is considered to have custody of client assets. Account custodians send statements directly to the account owners on at least a quarterly basis. Clients should carefully review these statements, and should compare these statements to any account information provided by ESWM.

Investment Discretion

ESWM does have investment discretion to manage securities accounts on behalf of clients, but clients may place limitations on this authority. ESWM requests that a client sign an Investment Management Agreement before assuming this authority.

Voting Client Securities

ESWM does not vote client security proxies.

Financial Information

ESWM has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage client accounts.