

# STEWARD FINANCIAL GROUP

## Form ADV Part 2A – Disclosure Brochure

**Effective: September 2015**

This Disclosure Brochure provides information about the qualifications and business practices of Steward Financial Group, LLC (“SFG”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (817) 428-1145 or by email at [mail@stewardfinancialgroup.com](mailto:mail@stewardfinancialgroup.com).

SFG is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about SFG to assist you in determining whether to retain the Advisor.

Additional information about SFG and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Steward Financial Group, LLC**

**CRD No: 143513**

**5850 Colleyville Blvd. #110  
Colleyville, TX 76034**

**Phone: (817) 428-1145 \* Fax: (817) 224-2204**

**[stewardfinancialgroup.com](http://stewardfinancialgroup.com)**

## Item 2 – Material Changes

---

The Form ADV 2 is divided into two parts: *Part 2A and Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of SFG.

SFG believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Since our last annual update, dated March 2014, there have been no material changes to our Disclosure Brochure and Brochure Supplements.

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of SFG.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information for SFG:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **143513** (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the SFG.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (817) 428-1145 or by email at [mail@stewardfinancialgroup.com](mailto:mail@stewardfinancialgroup.com).

## Item 3 – Table of Contents

---

<b>Item 1 – Cover Page.....</b>	<b>i</b>
<b>Item 2 – Material Changes.....</b>	<b>ii</b>
<b>Item 3 – Table of Contents .....</b>	<b>iii</b>
<b>Item 4 – Advisory Services .....</b>	<b>1</b>
Firm Information.....	1
Advisory Services Offered.....	1
<i>Account Portfolio Management</i> .....	1
Financial Planning.....	2
Client Account Management.....	2
Wrap Fee Programs.....	2
Assets Under Management.....	3
<b>Item 5 – Fees and Compensation.....</b>	<b>3</b>
Fees for Advisory Services.....	3
Fee Billing.....	4
Financial Planning.....	4
Other Fees and Expenses .....	4
Advance Payment of Fees and Termination.....	4
Compensation for Sales of Securities.....	5
<b>Item 6 – Performance-Based Fees and Side-By-Side Management.....</b>	<b>5</b>
<b>Item 7 – Types of Clients .....</b>	<b>5</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>5</b>
Methods of Analysis .....	5
Risk of Loss .....	6

<b>Item 9 – Disciplinary Information .....</b>	<b>6</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>	<b>7</b>
Law Firm Affiliation .....	7
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions             and Personal Trading .....</b>	<b>7</b>
Code of Ethics.....	7
Personal Trading with Material Interest.....	7
Personal Trading in Same Securities as Clients .....	7
Personal Trading at Same Time as Client.....	8
<b>Item 12 – Brokerage Practices .....</b>	<b>8</b>
Recommendation of Custodian[s] .....	8
Aggregating and Allocating Trades.....	9
<b>Item 13 – Review of Accounts.....</b>	<b>9</b>
Frequency of Reviews .....	9
Causes for Reviews .....	9
Review Reports .....	10
<b>Item 14 - Client Referrals and Other Compensation.....</b>	<b>10</b>
Client Referrals from Solicitors .....	10
<b>Item 15 – Custody .....</b>	<b>10</b>
<b>Item 16 – Investment Discretion .....</b>	<b>10</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>11</b>
<b>Item 18 – Financial Information .....</b>	<b>11</b>
<b>Privacy Policy .....</b>	<b>12</b>
Our Commitment to You.....	12
The Information We Collect About You .....	12
Information About You That SFG Shares.....	12
Information About Former Clients.....	13

Confidentiality and Security .....	13
We'll Keep You Informed .....	13

## Item 4 – Advisory Services

---

### **Firm Information**

Steward Financial Group, LLC (“SFG” or the “Advisor”) is a Registered Investment Advisor with the U.S. Securities and Exchange Commission, which is organized as a Limited Liability Company (LLC) under the laws of the State of Texas. SFG was founded in April 2007, and is owned and operated by Founding Principals, Vincent Hawkins and Dustin Stiefel. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SFG.

### **Advisory Services Offered**

SFG offers investment advisory services to individuals, high net worth individuals, trusts, estates, corporations and charitable organizations in Texas and other states (each referred to as a “Client”).

### Account Portfolio Management

SFG provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. SFG works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. SFG will then construct a portfolio, consisting of mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks and bonds, United States government bonds, and real estate investment trusts (“REITs”) to meet the needs of its Clients. Currently, SFG constructs portfolios using low cost asset class funds. Primarily SFG utilizes Dimensional Funds (DFA) for the construction of client portfolios, however there is no relationship existing between DFA and SFG that would create a conflict of interest. Low cost asset class funds do not contain 12b-1 fees, which means that the brokerage firms are not being compensated by these funds, therefore the brokerage firms charge a trade fee whenever these funds are bought and sold. These fees are typically \$25.00 per trade. Because of the existing trade charge SFG has a de minimus trade rule of \$5,000, however SFG will place trades below that amount in certain circumstances. Additionally, due to the \$25.00 trade fee clients hiring SFG should expect to be long term investors.

SFG’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. SFG will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

SFG evaluates and selects assets for inclusion in Client portfolios only after applying their internal due diligence process. SFG may recommend, on occasion, redistributing investment allocations to diversify the portfolio. SFG may recommend specific positions to increase asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. SFG may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, risk exposure to a specific class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

**Prior to rendering investment advisory services, SFG will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].**

SFG will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will SFG accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

## **Financial Planning**

SFG will typically provide financial planning services to individuals and families as part of its investment advisory services. Services are provided in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. SFG may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. The Advisor may provide a written summary of Client's financial situation, observations, and recommendations.

## **Client Account Management**

Prior to engaging SFG to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – SFG, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – SFG will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – SFG will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – SFG will provide investment management and ongoing oversight of the Client's portfolio and overall account.

## **Wrap Fee Programs**

SFG does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by SFG.

## Assets Under Management

As of December 31, 2014, the most recent date for which such calculations are provided pursuant to securities regulations, SFG manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$175,933,313
Non-Discretionary Assets	\$ 0
Total	\$ 175,933,313

Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

---

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of SFG and the Client.

### Fees for Advisory Services

#### Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Investment Advisory Fees range from 1.25% to 1.00% based on the following schedule:

Assets Under Management	Annual Rate
\$0 to \$2,000,000	1.25%
Next \$2,000,001 to \$4,000,000	1.00%
\$4,000,000 to Above	Negotiable

Investment Advisory Fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by SFG will be independently valued by the designated Custodian. SFG will not have the authority or responsibility to value portfolio securities.

SFG's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, SFG shall not receive any portion of these commissions, fees, and costs.

## Financial Planning

SFG offers financial planning as part of its investment advisory services. SFG does not charge a separate fee for this service. Prospective clients will still retain the results of any planning if they elect not to become a client.

## **Fee Billing**

### Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send the fee amount to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with SFG at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of the fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting SFG to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

## **Financial Planning**

Financial planning services are provided as part of the investment advisory service and are not offered apart from the investment advisory services.

## **Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third-parties, other than SFG, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by SFG is separate and distinct from these custodian and execution fees.

In addition, all fees paid to SFG for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of SFG, but would not receive the services provided by SFG which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by SFG to fully understand the total fees to be paid.

## **Advance Payment of Fees and Termination**

### Account Portfolio Management

SFG is compensated for its services in advance the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with SFG, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned,

prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

### Financial Planning

Financial planning services are provided as part of the investment advisory service and are not offered apart from the investment advisory services.

### **Compensation for Sales of Securities**

SFG does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

---

SFG does not charge performance-based fees for its investment advisory services. The fees charged by SFG are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

SFG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

---

SFG offers investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- 501(c)(3) Non-Profit Organizations – mission-based, non-profit organizations
- Corporations and Businesses – taxable business entities, investing cash reserves

SFG generally does not impose a minimum account size for establishing a relationship.

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

---

### **Methods of Analysis**

SFG primarily employs the risk factor model and modern portfolio theory in developing investment strategies for its Clients. Research and analysis from SFG is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and academic scholars.

As noted above, SFG generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. SFG will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, SFG may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. SFG will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

The Risk factor model expands on the capital asset pricing model (CAPM) by adding size and value factors in addition to the market risk factor in CAPM. This model considers the fact that value and small cap stocks tend to outperform markets historically. By including these two additional factors, the model adjusts for the outperformance tendency, which is thought to make it a better tool to capture market returns. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the analysis may lose value and may have negative investment performance. The Advisor monitors these risk factors to determine if adjustments to strategic allocations are appropriate. More details on the SFG's review process is included in Item 13.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (817) 428-1145 or via email at [mail@stewardfinancialgroup.com](mailto:mail@stewardfinancialgroup.com).**

## Item 9 – Disciplinary Information

---

**There are no legal, regulatory or disciplinary events involving SFG or any of its employees.** SFG and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **143513** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Vincent Hawkins, Dustin Stiefel and Steven Early by selecting the Investment Adviser Representative and entering Mr. Hawkin's, Mr. Stiefel's, Mr. Early's or Mr. McIntosh's Individual CRD#, **5098143, 2932117, 4617927 and 6351596** respectively in the field labeled "Individual CRD Number".

## Item 10 – Other Financial Industry Activities and Affiliations

---

### Law Firm Affiliation

Mr. Early, Investment Advisor Representative, is also a practicing attorney and owner of Steven A. Early PC. He may offer clients legal advice or services.

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

---

### Code of Ethics

SFG has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with SFG. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. SFG and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SFG associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. SFG has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (817) 428-1145 or via email at [mail@stewardfinancialgroup.com](mailto:mail@stewardfinancialgroup.com).

### Personal Trading with Material Interest

SFG allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. SFG does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. SFG does not have a material interest in any securities traded in Client accounts.

### Personal Trading in Same Securities as Clients

SFG allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

## Personal Trading at Same Time as Client

While SFG allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these trades are typically mutual funds which trade at NAV. These trades may be and often are placed at the same time as of Client transactions. SFG will place trades only after Client orders have been placed and filled.

**At no time, will SFG or any associated person of SFG, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

---

### Recommendation of Custodian[s]

SFG does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize SFG to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, SFG does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where SFG does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by SFG. SFG may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. SFG does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Following are additional details regarding the brokerage practices of the Advisor:

**1. *Soft Dollars*** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **SFG does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, SFG may receive from Schwab (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist SFG to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by SFG may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software, and/or other products used by SFG in furtherance of its investment supervisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist SFG in managing and administering client accounts. Others do not directly provide such assistance, but rather assist SFG to manage and further develop its business enterprise.

SFG's clients do not pay more for investment transactions effected and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by SFG to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as result of the above arrangement.

SFG's Chief Compliance Officer, Vince Hawkins, is available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

**2. Brokerage Referrals** - SFG does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where SFG will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, SFG will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

## **Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. SFG will execute its transactions through an unaffiliated broker-dealer selected by the Client. SFG may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

## **Item 13 – Review of Accounts**

---

### **Frequency of Reviews**

Accounts are monitored on a regular and continuous basis by Mr. Hawkins, Founding Principal, Mr. Stiefel, Founding Principal, or Mr. Joe McIntosh, Advisor of SFG. Formal reviews are generally conducted at least quarterly or more or less frequently depending on the needs of the Client.

### **Causes for Reviews**

In addition to the investment monitoring noted above, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify SFG if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

## **Review Reports**

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. SFG may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

---

### **Client Referrals from Solicitors**

SFG compensates Steven Early as a percentage of advisory fees earned due to his referral to the advisory firm. Mr. Early may receive up to 40% of the advisory fees earned. Should Mr. Early terminate his agreement with SFG and take clients currently at SFG to another advisor, Mr. Early would have to compensate SFG for lost revenues.

## **Item 15 – Custody**

---

SFG does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct SFG to utilize that custodian for the Client's security transactions. SFG encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

However, with a client's consent, SFG may be provided with the authority to seek deduction of SFG's fees from a client's accounts; this process generally is more efficient for both the client and the investment adviser. The account custodian does not verify the accuracy of SFG's advisory fee calculation.

All SFG clients receive account statements directly from qualified custodians, such as a bank or broker dealer that maintains those assets. The client should carefully review these account statements, and compare them to the quarterly or other reports provided by SFG. Statements provided by SFG may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. SFG urges all clients to compare statements in order to ensure that all account transactions, including deductions to pay advisory fees, remain proper, and to contact Vince Hawkins, Chief Compliance Officer with any questions.

## **Item 16 – Investment Discretion**

---

SFG will only have discretionary authority to place trades without prior Client approval when rebalancing the account back to previously determined asset levels. SFG will only change the asset allocation after obtaining approval from the Client.

## Item 17 – Voting Client Securities

---

SFG does not accept proxy-voting responsibility for any Client.

## Item 18 – Financial Information

---

Neither SFG, nor its management has any adverse financial situations that would reasonably impair the ability of SFG to meet all obligations to its Clients. Neither SFG, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. SFG is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

## Privacy Policy

---

Effective: March 2015

### Our Commitment to You

Steward Financial Group, LLC ("SFG") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. SFG (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does SFG provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

### Information About You That SFG Shares

SFG works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business

arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy SFG's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

### **Information About Former Clients**

SFG does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

### **Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

### **We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (817) 428-1145 or via email at [mail@stewardfinancialgroup.com](mailto:mail@stewardfinancialgroup.com).