
Steward Inc.

3576 Winfield Lane Northwest
Washington, DC, 20007

Form ADV Part 2A – Firm Brochure

(917) 547-3227

www.oursteward.com

Dated September 15, 2021

This Brochure provides information about the qualifications and business practices of Steward Inc., “Steward”. If you have any questions about the contents of this Brochure, please contact us at (917) 547-3227. 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.

Steward Inc. is registered as an Investment Adviser with the United States Security Commission (SEC). Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Steward is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number 314340.

Item 2: Material Changes

Since this is the first filing of the Form ADV Part 2A for Steward, there is nothing to report. In the future, any material changes made during the year will be reported here.

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Item 4: Advisory Business

Description of Advisory Firm

Steward Inc. is registered as an Investment Adviser with the United States Security Commission (SEC). We were founded in April 2021. Ami Nash Shah, Chief Executive Officer and Viktor Müller, President and Chief Compliance Officer, are the equal owners of Steward, each owning fifty percent (50%). Because Steward does not provide investment management services, it has no Assets Under Management to report.

Types of Advisory Services

Financial Wellness

Steward's goal is to help clients achieve Financial Wellness through providing:

1. Initial Financial Plan
2. Ongoing Service
3. Newsletters

Initial Financial Plan – Steward's goal is to address all aspects of a client's financial need, providing a roadmap to achieve their goals. The financial plan is a comprehensive evaluation focusing on the seven core areas of personal finance, addressing areas of concern, a client may have, as well as any issues a client may not be aware of. The key defining aspect of financial wellness is that through the financial planning process, all questions, information and analysis will be considered as they impact and are impacted by the entire financial and life situation of the client. This may include assisting clients with their savings, ensuring they allocate funds in a priority order. For example, maxing out their 401(k) employer match, creating an emergency fund, pay down expensive debt, max out IRAs, investing for short term goals, investing for long term wealth accumulation. We recommend specific accounts and investment products for each. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

The four core areas we focus on:

- **Cash Flow:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included. **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal. We will also advise clients what accounts to use to save and invest these reserves while working towards their goals.

The final product is a detailed digital plan that provides in-depth analysis and specific recommendations in each of the four topic areas of personal finance. Additional information on our fees is provided under Section 5 of this document.

Typically, the Financial Wellness Plan will be presented to the client as soon as they share the required data in the form of a discovery questionnaire.

The client always has the right to decide whether or not to act upon our recommendations. If the client elects to act on any of the recommendations, the client always has the right to affect the transactions through anyone of their choosing.

Ongoing Service

Steward provides clients with an ongoing planning service. Clients can at any time update their data to receive a new plan. This allows clients to keep their financial plan up to date and in line with their changing life.

Furthermore Steward helps clients track their progress as they complete recommended actions, enabling them to form good financial habits by celebrating their success and reinforcing the behaviors that lead to them.

Investment Newsletters

Steward provides to current clients, and prospective clients, ongoing financial communications which may be purchased from a financial communications firm or created internally. Newsletters are always offered on an impersonal basis and do not focus on the needs of a specific individual.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans are dependent upon a client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees and without penalty. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Financial Wellness: Initial (Plan Only)

We believe that financial planning is an essential service. Therefore, we charge a fixed fee of \$1,000, to all clients. The fee is negotiable. The fixed fee of \$1,000 is due at the plan presentation.

Financial Wellness: Ongoing Service

Once clients have received their financial plan, they have the option to engage in our Ongoing Service. The Ongoing fee is paid monthly, quarterly or annually, in advance, at the rate of \$5 - \$50 per month. The fee may be negotiable, in certain cases. This service may be terminated with 30 days' notice.

Other Types of Fees and Expenses

When implementing an investment recommendation, the client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning services to individuals and high net-worth individuals.

We do not have a minimum account size requirement however we specialize in mass affluent clients with high disposable income and positive net worth.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

When clients request us to complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, we adhere to latest research in that long-term investing in line with market allocations, offering the best risk adjusted returns.

Passive Investment Management

We primarily recommend passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Material Risks Involved

Steward does not provide investment management; however, investment recommendations may be made as part of the financial planning service. **All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and micro market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions you may be unable to sell or liquidate investments at prices you would consider reasonable or favorable or find buyers at any price.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

Item 9: Disciplinary Information

Criminal or Civil Actions

Steward and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Steward and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Steward and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Steward or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No Steward employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Steward employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Steward does not have any related parties. As a result, we do not have a relationship with any related parties.

Steward only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Recommendations or Selections of Other Investment Advisers

Steward does not recommend or select other investment advisers for its clients and does not have any other business relationships with other advisers.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. Our policy is designed to assure that the personal securities transactions, activities and interests of the employees of our firm will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities at/Around the Same Time as Client's Securities

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Steward Inc. does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Since we do not offer investment management services, we do not have a concern over which broker-dealers a client may choose in order to implement our investment recommendations.

Aggregating (Block) Trading for Multiple Client Accounts

Some Registered Investment Advisers execute client accounts on an aggregated basis as a way to lower expenses. As a fee only financial planner, who does not offer investment management services, we do not execute trades on behalf of clients. As a result, it is up to the client to negotiate their own trading costs with their broker-dealer.

Item 13: Review of Accounts

We work with clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. We do not provide specific reports to clients, other than financial plans.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Steward does not accept custody of client funds.

Item 16: Investment Discretion

We do not provide investment management services, and therefore do not exercise discretion.

Item 17: Voting Client Securities

Steward does not provide investment management services and does not vote client securities. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or nor do not require the prepayment of fees of more than \$1,200 six months or more in advance.

Business Continuity Plan Notice

General

Steward Inc. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snowstorms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Locations

Alternate locations are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

Steward Inc. utilizes a “team approach” to working, so generally all tasks can be performed by more than just one Steward Inc. employee. This has been purposely done in order to provide redundancies in the event that a key employee is not available, and we consider this to be a best practice.

Privacy Notice

FACTS

WHAT DOES STEWARD INC. DO WITH YOUR PERSONAL INFORMATION?

Why?	Registered Investment Advisers choose how they share your personal information. Federal law gives clients the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none">▪ Information you provide in the subscription documents and other forms (including name, address, social security number, date of birth, income and other financial-related information); and▪ Data about your transactions with us (such as the types of investments you have made and your account status).
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Steward Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information

For our everyday business purposes— to process your transactions, maintain your accounts (for example we may share with our third-party service providers that perform services on our behalf or on your behalf, such as accountants, attorneys, consultants, clearing and custodial firms, and technology companies, respond to court orders and legal investigations, or report to credit bureaus.

For Marketing purposes— to offer our products and services to you

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.

Our employees are advised about Steward's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Other important information

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.

Steward Inc.
3576 Winfield Lane Northwest
Washington, DC, 20007

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Dated September 15, 2021

Form ADV Part 2B – Brochure Supplement

For

Ami Nash Shah, CFP®

Chief Executive Officer

This brochure supplement provides information about Ami Nash Shah that supplements the Steward Inc. (“Steward”) brochure. A copy of that brochure precedes this supplement. Please contact Ami Nash Shah if the Steward brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Ami Nash Shah is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 6622964.

Item 2: Educational Background and Business Experience

Ami Nash Shah, CFP®

Born: 1988

Educational Background

- 2010 – Bachelor of Science, Economics and Sociology, Harvard University
- 2015 – Master of Business Administration, Harvard Business School

Business Experience

- 03/2021 – Present, Steward Inc., Chief Executive Officer
- 09/2020 – 03/2021, Hemmington Wealth Management, Wealth Advisor
- 12/2015 – 08/2020, McKinsey & Company, Engagement Manager
- 07/2015 – 11/2015, Jet.com, Associate Director of Marketing

Professional Designations, Licensing & Exams

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3: Disciplinary Information

No management person at Steward Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Ami Nash Shah is not involved with outside business activities.

Item 5: Additional Compensation

Ami Nash Shah does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Steward.

Item 6: Supervision

Viktor Muller, as President and Chief Compliance Officer of Steward, is responsible for supervision and supervises personnel. Viktor Muller monitors the recommendation system to ensure it is suitable for the client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client.