



THE
STEWARDSHIP
SOLUTION

The Stewardship Solution Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of The Stewardship Solution. If you have any questions about the contents of this brochure, please contact us at (661) 829-4154 or by email at: dhubbard@thestewardshipsolution.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 The Stewardship Solution is also available on the SEC's website at www.adviserinfo.sec.gov. The Stewardship Solution's CRD number is: 282050.

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The Stewardship Solution is a registered investment adviser. Registration does not imply a certain level of skill or training.

Version Date: September 5, 2024

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (661) 829-4154.

Material Changes since the Last Update

The Stewardship Solution had the following material changes since the last Updated annual filing on March 6, 2024.

- Item 4 has been amended to reflect the change of domicile for the firm, from California to Tennessee. References to California Code and regulations are only included due to the fact TSS is still registered in California.
- Item 5 has been amended to reflect the fact financial planning fees are not being collected in advance.
- Inclusion of annual retainer as a fee option (See Item 5)

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Item 4: Advisory Business

A. Description of the Advisory Firm

The Stewardship Solution (hereinafter "TSS") is a Sole Proprietorship originally organized in the State of California and redomesticated to the State of Tennessee in 2023. The State of Tennessee Securities Division is the regulatory entity that has jurisdiction with respect to TSS. The firm was formed in November 2015, and the principal owner is Derrik Jacob Hubbard.

B. Types of Advisory Services

Investment Advisory Services

TSS provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. TSS provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with TSS. Managed Accounts are available to individuals and high net worth individuals.

TSS provides discretionary and non-discretionary investment advisory services to some of its clients through various managed account programs. TSS will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. TSS and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections

- Providing Firm Brochure (this document)

Financial Planning

Financial plans and financial planning may include, but are not limited to, investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

In offering financial planning, a conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

C. Client Tailored Services and Client Imposed Restrictions

TSS will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by TSS on behalf of the client. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent TSS from properly servicing the client account, or if the restrictions would require TSS to deviate from its standard suite of services, TSS reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. TSS does not participate in any wrap fee programs.

E. Assets Under Management

As of February 29, 2024, TSS has the following assets under management:

Discretionary	Non-Discretionary	Total
\$10,002,924	\$1,149,062	\$11,151,986

Item 5: Fees and Compensation

Lower fees for comparable services may be available from other sources.

A. Fee Schedule

Asset Management

Fees are charged monthly in arrears or in advance, depending on the platform used and are based primarily on asset size and the level of complexity of the services provided. In individual cases, TSS has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Fees for the initial month will be prorated based upon the number of calendar days in the calendar month that the advisory agreement is in effect. Fees are based on the market value of the assets on the last business day of the month. Annual fees range from 0.50% - 1.90%, depending on the amount of assets under management ("AUM") – See chart below. Consulting services are included in these fees for asset management services with the exception of unique circumstances that may require a separate agreement for financial planning services (description and fees are discussed below). If the situation warrants separate financial planning fees, it will be discussed upfront and a separate agreement will be negotiated.

Fee Schedule for Asset Management:

Total Account Value	Maximum Annual Advisory Fee
Under \$100,000	1.90%
\$100,000 - 250,000	1.70%
\$250,001 - 500,000	1.65%
\$500,001 - 1,000,000	1.60%
\$1,000,001 or more	1.55%

As authorized in the client agreement, the account custodian withdraws advisory fees directly from the clients' accounts according to the custodian's policies, practices, and procedures. The custodial statement includes the amount of any fees paid to TSS for advisory services. You should carefully review the statement from your custodian/broker-dealer's statement and verify the calculation of fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations.

Fees are charged in arrears or in advance, depending on the platform used, on a monthly basis, meaning that advisory fees for a month are charged on either the first or last day of the month. Clients may terminate investment advisory services obtained from TSS, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with TSS. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by TSS. Clients who terminate investment advisory services during a month are charged a prorated advisory fee based on the date of TSS's receipt of client's written

notice to terminate. Any earned but unpaid fees are immediately due and payable, and any prepaid and unearned fees will be immediately refunded.

Financial Planning Fees

Fixed Fees: The negotiated fixed rate for creating client financial plans is between \$500 and \$3,000.

Hourly Fees: The hourly fee for these services is between \$150 and \$200.

Annual Retainer: At a rate negotiated between the client and TSS, clients can elect to pay a retainer annually in arrears for financial planning services. This fee would come from the client's advisory account as specified in the investment advisory agreement.

Clients may terminate the agreement without penalty for a full refund of TSS's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Financial planning fees are paid via check or wire upon presentation of the plan.

B. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by TSS. Please see Item 12 of this brochure regarding broker-dealer/custodian.

C. Prepayment of Fees

TSS collects fees monthly, or annually, in arrears, or in advance, depending on the platform used. For the removal of doubt, the annual fee option is solely to be paid in arrears. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (* The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

D. Outside Compensation for the Sale of Securities to Clients

Derrick Jacob Hubbard does not receive any outside compensation for the sale of securities.

Clients always have the option to purchase TSS recommended products through other brokers or agents that are not affiliated with TSS.

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

TSS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

TSS generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of TSS's services and the third-party advisers do not impose account minimums in connection with TSS's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis & Investment Strategies

TSS does not manage client assets and therefore, does not have any specific methods of analysis or investment strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis & Investment Strategies

Selection of Other Advisers: Although TSS will seek to select only money managers who will invest clients' assets with the highest level of integrity, TSS's selection process cannot ensure that money managers will perform as desired and TSS will have no control over the day-to-day operations of any of its selected money managers. TSS would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Derrick Jacob Hubbard is not registered as a broker/dealer or broker/dealer representative.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither TSS nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Derrick Jacob Hubbard is an independent licensed insurance agent.

From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. TSS always acts in the best interest of the client and clients are in no way required to the services of any representative of TSS in connection with such individual's activities outside of TSS.

All material conflicts of interest under California Code of Regulations Section 260.238(k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

TSS may refer clients to third-party investment advisers to manage all or a portion of the client's assets. TSS will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between TSS and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that TSS has an incentive to refer clients to the third-party investment advisers that provide TSS with a larger fee split. TSS will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. TSS will ensure that all recommended advisers are licensed or notice filed in the states in which TSS is recommending them to clients.

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

A. Code of Ethics

TSS has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. TSS's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

TSS does not recommend that clients buy or sell any security in which a related person to TSS or TSS has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of TSS may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of TSS to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. TSS will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of TSS may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of TSS to buy or sell securities before or after recommending securities to clients, resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, TSS will never engage in trading that operates to the client's disadvantage if representatives of TSS buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

In order for TSS to provide asset management services, we request you utilize the brokerage and custodial services of Goldman Sachs or Allianz (“Goldman and Allianz”), for which we have an existing relationship. TSS, Goldman and Allianz are not affiliated companies. In considering which independent qualified custodian will be the best fit for TSS’s business model, we are evaluating the following factors, which is not an all-inclusive list:

- Financial strength
- Reputation
- Reporting capabilities
- Execution capabilities
- Pricing, and
- Types and quality of research

A detailed description, list of services, and additional disclosures will be made during the revision of this brochure once an arrangement is finalized.

While you are free to choose any broker-dealer or other service provider, we recommend that you establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including, but not limited to research, market information, and administrative services that help our firm manage your account(s). We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended broker-dealers, including the value of research provided, the firm’s reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

1. Research and Other Soft Dollar Benefits

TSS does not trade client’s accounts and therefore receives no research, product, or services from a broker-dealer (“soft dollar benefits”).

2. Brokerage for Client Referrals

TSS receives 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

TSS does not engage in-directed brokerage on behalf of clients.

B. Aggregating (Block) Trading for Multiple Client Accounts

When TSS buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single “block” in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions. No client is favored over any other client. If an order is not completely filled, it is allocated pro-rata based on an allocation statement prepared by TSS prior to placing the order. Because of an order’s aggregation, some clients may pay higher transaction costs, or greater spreads, or receive less favorable net prices on transactions than would otherwise be the case if the order had not been aggregated.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for TSS's advisory services provided on an ongoing basis are reviewed at least quarterly by Derrick Jacob Hubbard, Managing Member, with regard to clients’ respective investment policies and risk tolerance levels. All accounts at TSS are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Derrick Jacob Hubbard, Managing Member. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, TSS's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of TSS's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

TSS may receive compensation from the selected third-party advisers via a fee split, but otherwise does not receive any economic benefit from any other third party for advice rendered to TSS's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

TSS does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

TSS does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

Some clients may execute limited powers of attorney or other standing letters of authorization that permit the firm to transfer money from their account with the client's independent qualified Custodian to third parties. This authorization to direct the Custodian may be deemed to cause our firm to exercise custody over your funds or securities and for regulatory reporting purposes, we are required to keep track of the number of clients and accounts for which we may have this ability. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate any transfers that may have taken place within your account(s) each billing period. You should carefully review account statements for accuracy.

Item 16: Investment Discretion

Before TSS can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the “Advisory Business” section of this Brochure for more information on our discretionary management services.

Item 17: Voting Client Securities (Proxy Voting)

TSS will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

TSS neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither TSS nor its management has any financial condition that is likely to reasonably impair TSS’s ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

TSS has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

TSS currently has only one management person: DERRIK JACOB HUBBARD. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

TSS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have with Issuers of Securities (If Any)

Neither TSS, nor its management persons, has any relationship or arrangement with issuers of securities. See Item 10.C and 11.B.