

# Winslow Wealth Management LLC

175 Federal Street

Boston, MA 02110

617-896-3500

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This Brochure provides information about the qualifications and business practices of Winslow Wealth Management LLC ("Winslow Wealth Management"). If you have any questions about the contents of this Brochure, please contact us at 617-896-3500 or [lberline@e-winslow.com](mailto:lberline@e-winslow.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.

Winslow is an SEC registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Winslow is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 – MATERIAL CHANGES**

Since this is the initial Brochure of Winslow Wealth Management, there are no material changes. In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Additional information about Winslow Wealth Management is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Winslow Wealth Management who are registered, or are required to be registered, as investment adviser representatives.

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Brochure Supplement(s)

## **ITEM 4 – ADVISORY BUSINESS**

### **A. Advisory Firm**

Winslow Wealth Management is newly registered with the Securities and Exchange Commission as an investment adviser providing a variety of advisory services to its clients. The advisory services are provided by a professional and support staff of 5 individuals. The Firm's majority owners are Winslow Financial Inc. and indirectly Robert Maloney.

### **B. Advisory Services**

The Company provides discretionary and non-discretionary investment advisory services.

Your Advisory representative will offer you advice on your portfolio on an individualized basis. In such a case, your portfolio will be managed, either on a discretionary basis where the Advisory Representative has authority to enter trades without your prior approval, or on a non-discretionary basis where he or she will discuss the recommendation with you prior to it being executed. The advice will be based on a number of factors including your investment objectives and risk tolerance.

#### **Client Imposed Restrictions**

You may impose reasonable restrictions on the securities purchased for your account or the way the your account is managed. You may impose restrictions, for example, in order to gain a tax advantage or other objectives such as avoiding the holdings of securities of companies in certain businesses (tobacco, alcohol or arms). Any restrictions you impose may adversely affect the risk-reward level of your portfolio. We will honor the restrictions absent extraordinary circumstances. The restrictions you impose, with respect to certain assets in a managed account, may cause a portion of the portfolio to be placed outside the manager's discretion, expertise and judgment as to the purchasing, holding or selling particular securities. Your decision to retain certain assets may have an adverse impact on the amount of risk assumed by you and may hinder the investment manager's ability to manage the portfolio properly according to your stated objectives.

#### **Assets Under Management**

As of November 15, 2012, Winslow Wealth Management did not manage any accounts as it is a newly formed investment adviser.

## **ITEM 5 - FEES AND COMPENSATION**

### **A. Fees**

Winslow Wealth Management fee for investment advisory services is 1% annually of the value of the portfolio calculated and billed quarterly in arrears. The advisory fee is deducted directly from your brokerage account. You will be provided with a copy of the invoice showing the value of the account and the amount of the fee.

#### **B. Other Fees and Expenses**

You will incur additional costs including brokerage commissions, SEC fees, ticket charges and any mutual fund may also include 12b-1 trail commissions and expenses paid by the mutual fund in connection with its management.

#### **C. Prepaid Fees**

If you pay a fee in advance and you decide to close your account or terminate the service, the fee will be refunded to you on a pro rata basis for the period in which services have not been rendered. We will do this automatically and you will not have to request a refund. If you close your account, the quarterly fee, if not prepaid, will be charged to your account.

#### **D. Commissions and other Fee Income Received by Winslow Wealth Management**

There is an inherent conflict of interest in rendering services to you in which an affiliate of Winslow Wealth Management may receive additional compensation. An affiliate of Winslow Wealth Management may serve as a corporate trustee and receive a nominal fee for that service. No other fees are received by us for the services we render.

#### **E. Termination of Agreement**

You or we may terminate the Agreement at any time, for any reason upon receipt of 30 days written notice. Upon termination, any prorated amount of fee due will be charged. In the event that there are any prepaid, unearned fees, they will be promptly refunded to you. You have the right to terminate the agreement without penalty within five business days after entering into the agreement.

## **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Winslow does not offer performance based fee arrangements.

## **ITEM 7 – TYPES OF CLIENTS**

Winslow Wealth Management provides investment supervisory services to individuals, pension and profit sharing plans, trusts, estates or charitable organizations and other corporate entities.

Winslow Wealth Management does not require any initial minimum dollar amount to establish an account.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

Investing in securities involves risk of loss that you should be prepared to bear.

### **A. Methods of Analysis**

Winslow Wealth Management uses charting, fundamental, technical and cyclical methods of analysis. Charting, cyclical and technical analysis are security analysis disciplines for forecasting the direction of prices through the study of past market data, primarily price and volume. Fundamental analysis includes economic analysis, industry analysis and company analysis. On the basis of these analyses the intrinsic value of the shares are determined.

Winslow Wealth Management employs a buy and hold strategy generally but market, economic and other events may require more frequent trading. A buy and hold strategy involves selecting investments with a long term view. Changes in the economy, international events, etc may direct that trading frequency be increased in order to hedge the investments, take gains or avoid or minimize losses

### **B. Material Risks**

All of the methods of analysis and investment strategies involve risk. The inherent risk in the methods of analysis are that the analysis will not be predictive of future market activity. Charting, cyclical and technical analysis weigh heavily on past market performance. Fundamental analysis may not be predictive of events, either within a company or external to it, that would affect the value of the security.

### **C. Types of Securities Recommended**

We recommend equities, bonds, mutual funds, ETF's, insurance products and alternative investments. These investments all involve risk unlike insured products, such as bank deposits.

## **ITEM 9 – DISCIPLINARY INFORMATION**

There is no disciplinary information to report.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **A. Affiliations**

Winslow Wealth Management is an affiliate of Winslow Insurance Agency, Inc and Winslow, Evans & Crocker, Inc., which is registered as an investment adviser and broker dealer and Winslow Fiduciary Services, LLC, which acts as a corporate trustee.

### **B. Commodities Activities**

Winslow Wealth Management, including its employees or officers, does not have a registration as a futures merchant, commodity pool operator, a commodity trading advisor, or as an associated person of any of the foregoing.

### **C. Material Arrangements**

Winslow Wealth Management clients may retain Winslow Fiduciary Services as corporate trustee. Winslow Fiduciary Services provides that service for a nominal amount.

## **ITEM 11 – CODE OF ETHICS**

### **A. Code**

Winslow Wealth Management has adopted a Code of Ethics pursuant to SEC Rule 204A-1. The Code expresses our commitment to ethical conduct and requires high standards of business conduct and compliance with federal and state securities laws. Our Code stresses that no person employed by us shall prefer his/her own interests to those of advisory clients and the Code prohibits the use of material non-public information.

To supervise compliance with its Code of Ethics, Winslow Wealth Management requires that anyone associated with our advisory practice with access to advisory recommendations, client holdings or other specified information, provide initial and annual securities holding reports and quarterly transaction reports of all reportable transactions to the Winslow Wealth Management's Chief Compliance Officer.

Winslow Wealth Management and our associated persons have a fiduciary responsibility to place your interests ahead of our and their interests. In summary, your interests come first. We must avoid taking inappropriate advantage of our position and must conduct our personal securities transactions in full compliance with the code.

## **B. Personal Trading**

Employees of Winslow Wealth Management often buy and sell the same securities that we may recommend to you. Those persons may have investment goals and objectives or needs that differ from yours which could result in their trading in ways different from or opposite of the recommendations we may make to you. For example, we may recommend that you purchase securities as a long term investment and at the same time, an employee with an aggressive trading strategy may be selling the same security. It is also possible that we could recommend one client buy at the same time another client may be selling due to different investment objectives or due to a client needing liquidity.

## **C. Securities Transactions by Employees**

Generally, trading is done on a client by client basis and to the extent that a recommendation to buy or sell is being made to our clients, our employees would be prohibited from trading in advance of that recommendation and would need to wait until all client orders have been filled.

# **ITEM 12 – BROKERAGE PRACTICES**

## **A. Broker Dealers Executing Client Transactions**

We may and often have the authority to determine which securities, the amounts of securities that are bought or sold, the broker dealer to use for transactions and the commission costs that will be charged for transactions. As a general matter, all advisory clients have brokerage accounts with an independent brokerage firm. Those rates may be higher than the lowest possible rate some other broker may charge for the same transaction.

### **1. Soft Dollars**

Winslow Wealth Management may receive economic benefit from the placement of trades in your account with other broker dealers. Such arrangements are referred



to as "soft dollars," a practice where a third party broker will pay certain expenses of a party directing brokerage to it. Such arrangements can create an inherent conflict of interest when the adviser places trades, a client pays commissions and the adviser gains some advantage.

2. Brokerage for Client Referral

Winslow Wealth Management does not participate in any directed brokerage for client referrals.

3. Directed Brokerage

Winslow Wealth Management does not allow clients to direct brokerage to other broker dealers.

**B. Brokerage Aggregation**

Your transactions may be aggregated with other client orders. Aggregation will occur where the same security is either purchased or sold across a group of client accounts which receive the same advisory services. Aggregation, the bunching of various client orders in the same security, can result in more or less favorable executions depending on the particular security or market. In other cases, transactions in your account will be entered on an individualized basis, for example where you open an account or have some liquidity need that results in a sale.

**ITEM 13 – REVIEW OF ACCOUNTS**

**A. Periodic Review**

Winslow Wealth Management periodically reviews your account on at least a monthly basis or more frequently as market conditions may warrant. All of our advisory accounts are supervised by and reviewed by the Chief Investment Officer or the Chief Executive Officer.

**B. Other than Periodic Review**

We review accounts on other than a periodic basis based upon market conditions, economic events, international issues and other events that may have an impact on the securities held in the accounts of our clients.

**C. Reports**

You will receive monthly or quarterly statements from the custodian for your account. The monthly or quarterly statements provide you with the holdings in your account and the market values as of the month or quarter ending. We do not prepare any other reports for your account on a regular basis.

#### **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

##### **A. Other Economic Benefits**

Winslow Wealth Management does not receive any economic benefit from any third party for the rendering of investment advice, other than as described in this Brochure.

##### **B. Referrals**

Winslow Wealth Management does not compensate non employees for client referrals and it does not use marketing or other firms for client solicitations.

#### **ITEM 15 – CUSTODY**

Cash and securities are maintained in accounts maintained in your name at custodian broker dealers. Account statements are prepared and distributed by the custodian and are sent directly to you. In addition, since affiliates may serve as trustee for your account, Winslow Wealth Management may be deemed to have custody and/or possession of the assets held in client accounts. Winslow Wealth Management complies with the requirements under the Investment Advisers Act of 1940 relating to custody by an investment adviser.

#### **ITEM 16 – INVESTMENT DISCRETION**

For certain services, Winslow Wealth Management receives discretionary authority from our clients at the outset of an advisory relationship which authority allows us to select the security and amount of shares to be bought or sold.

In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for your account. When selecting securities and determining the number of shares, Winslow Wealth Management observes the investment objectives, limitations and restrictions of your account. Investment objectives and restrictions are provided in writing by you at the time of the opening of your account and as those objectives and restrictions may be changed from time to time, after discussion with you, and as provided in a subsequent written statement from you.

#### **ITEM 17 – VOTING CLIENT SECURITIES**

Winslow Wealth Management does not vote securities held in your account. Proxy materials are forwarded by the custodian directly to you. You can either vote proxies directly or you may be able to arrange for your custodian to vote the shares. Winslow does not give advice regarding the voting of proxies, corporate governance or litigation matters involving issuers that are part of your account.

#### **ITEM 18 – FINANCIAL INFORMATION**

Winslow Wealth Management is required to provide you with certain financial information or disclosures about our financial condition in the event of certain conditions. We have no financial commitments that impair our ability to meet contractual and fiduciary commitments to you, and we have not been the subject of a bankruptcy proceeding. We do not require prepayment of \$1,200 in fees six months or more in advance.