

GreensView Wealth Management LLC

GreensView Intelligent Portfolios Program

ADV Part 2A Brochure

June 2018

GreensView Wealth Management LLC

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312-471-1678

<https://www.Greensviewwealth.com/>

This Brochure provides information about the qualifications and business practices of GreensView Wealth Management LLC (collectively herein referred to as “GreensView” or the “Firm”). If you have any questions about the contents of this Brochure, please contact us at (312) 471-1678 and/or cpayne@graydoncs.com. Currently, our Brochure may be requested free of charge by contacting GreensView Wealth Management at (312) 471-1678 or cpayne@graydoncs.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about GreensView Wealth Management, including a copy of this brochure, is also available on the SEC’s website at: www.adviserinfo.sec.gov. The CRD number for GreensView is 297321.

References herein to GreensView Wealth Management as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.

Item 2 – Material Changes

GreensView submitted its initial registration with the SEC to become registered as an investment adviser in June 2018.

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Item 4 – Advisory Business

About GreensView Wealth Management

GreensView Wealth Management LLC (“GreensView” or “the Firm” or “We”) is a wealth management firm that offers financial planning, investment consulting, and investment management services, on a discretionary and non-discretionary basis.

GreensView Wealth Management is a Illinois-based limited liability company founded on June 26th, 2017. The firm submitted its registration to become an independent investment advisory firm in June of 2018, and will be registered with the Securities and Exchange Commission (“SEC”) under the Investment Advisors Act of 1940, as amended (the “Investment Advisors Act”). GreensView is 100% privately owned by Matthew Wilkes and is located at 1963 N. Halsted Street, Chicago, IL 60614.

Types of Advisory Activities

GreenView provides advisory services to certain clients through a website based program titled the GreensView Intelligent Portfolios (the “Program”). As part of the Program, we provides financial planning tools, risk metric tools and scenario planning tools which clients can access online through our website. Through the use of these tools a client will select certain advisory styles managed by GreensView. Advisory assistance is available to clients by request and delivered online by chat, by telephone or by email. A client of the Program is required to enter into one or more written agreements with us setting forth the terms and conditions under which we provide our services (collectively the “Agreement”).

In addition to the Program, we provide financial planning, consulting, and investment management services to individuals and their related entities, high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities through a different delivery and service model. GreensView maintains and delivers to these clients a different brochure tailored specifically to the provision of investment advisory services to such clients.

This disclosure brochure describes the Program and the delivery of the Program to clients.

The GreensView Intelligent Portfolios Program

The GreensView Intelligent Portfolios Program is an automated investment program (the “Program”) through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds (“ETFs”) and a cash allocation. The client may instruct us to exclude up to three ETFs from their portfolio. The client’s portfolio is held in a brokerage account opened by the client at Charles Schwab & Co., Inc. (“CS&Co”). We use the Institutional Intelligent Portfolios® platform (“Platform”), offered by Schwab Performance Technologies (“SPT”), a software provider to independent investment advisors and an affiliate of CS&Co., to operate the Program. We are independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (together, “Schwab”). We, and not Schwab, are the client’s investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing

a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. We have contracted with SPT to provide us with the Platform, which consists of technology and related trading and account management services for the Program. The Platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that we will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

We charge clients a fee for our services as described below under Item 5 Fees and Compensation. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to Charles Schwab & Co. as part of the Program. Schwab does receive other revenues in connection with the Program.

We do not pay SPT fees for the Platform so long as we maintain \$100 million in client assets in accounts at Charles Schwab & Co. that are not enrolled in the Program. If we do not meet this condition, then we pay SPT an annual licensing fee of Institutional Intelligent Portfolios® 0.10% (10 basis points) on the value of our clients' assets in the Program. This fee arrangement gives us an incentive to recommend or require that our clients with accounts not enrolled in the Program be maintained with Charles Schwab & Co.

As a wealth management firm, GreensView works to develop a comprehensive financial plan for many of our clients, including many clients enrolled in the GreensView Intelligent Portfolios Program. Financial planning service may be bundled alongside these services or offered independently as part of a separate financial planning agreement. Our financial planning process seeks to help our clients make decisions related to their financial affairs. The financial planning process helps us discover and prioritize our client's goals and objectives, gather data, and develop a unique strategy based on those goals. All strategies are customized to incorporate the client's individual needs and circumstances. Services provided to clients include investment, estate, insurance, charitable gift, and tax planning (particularly with regard to portfolio tax issues). Ongoing services may be provided through regular meetings that assess progress toward goals and monitor life transitions. We will also coordinate with other advisors (accountants, attorneys, insurance agents, etc.) to help develop holistic financial plans. Although the firm does seek to provide a complete financial plan, there is no legal counsel or tax advice provided.

Additional Services:

In addition to the advisory services described above, clients of the Program may receive additional services delivered through the Websites and/or through their financial advisor. The scope of these services includes the following: website navigation support; linking of accounts for aggregated viewing of portfolios; explanation of advisory process; explanation of the model portfolios; explanation of results of portfolio analysis; account opening support; and account transfer support.

GreensView Wealth Management may also furnish advice on matters not involving securities, such as:

- Retirement Income Planning Withdrawal Rate Analysis
- Insurance Review & Planning Corporate Retirement Plan Guidance
- Estate & Charitable Gift Planning
- Business Successions
- Education Planning
- Cash Flow & Budgeting
- Employee Benefits & 401(k) Guidance
- Tax Planning

Item 5 – Fees & Compensation

Clients participating in this program and/or receiving financial planning services shall pay GreensView investment management fees and/or financial planning fees.

Investment Management Fee

GreensView provides the Program services for an annual asset based fee of 0.40%. The firm, in its sole discretion, may negotiate to charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, *pro bono* activities, etc.).

Fees Charged by Schwab

As described in Item 4 Advisory Business, clients do not pay fees to SPT or brokerage commissions or other fees to Charles Schwab & Co. as part of the Program. Schwab does receive other revenues in connection with the Program. Brokerage arrangements are further described below in Item 12 Brokerage Practices.

Fees for Management During Partial Quarters of Service

For the initial period of investment management services, the fees shall be calculated on a pro rata basis.

The Agreement between GreensView and the client will continue in effect until terminated by either party pursuant to the terms of the Agreement. Our fees are prorated through the date of termination and any remaining balance is charged or refunded to you, as appropriate.

Additions may be in cash or securities provided that we reserve the right to liquidate any transferred securities or decline to accept particular securities into a client's account. In light of the investment parameters of the Program it is highly likely that we will liquidate any transferred securities accepted into the account. Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets will be adjusted or prorated based on the number of days remaining in the quarter.

Commissions or Sales Charges for Recommendations of Securities

As detailed in this brochure, all of your assets managed as part of the Program are held at the unaffiliated qualified broker-dealer custodian Charles Schwab & Co. In addition, all trading for client Program accounts is done through Charles Schwab & Co.. Therefore, the status of any Supervised Person as a registered representative of any unaffiliated broker-dealer (other than Charles Schwab & Co.) will in no way affect the execution of securities trades related to the Program.

Financial Planning Fees

Financial planning fees are charged on a per-plan (i.e. a flat fee) and/or monthly basis, according to the financial planning agreement. The amount of the financial planning fee is based upon several factors, including: net worth, gross income, complexity of one's financial affairs, and the time necessary to meet each individual client's goals and priorities. Certain unforeseen expenses may not be included in the financial planning fee and would be billed directly. As a wealth management firm, we consider our financial planning services to be a key extension of the wealth management process, and may waive the related financial planning fees and expenses as part of our overall investment management services. An upfront financial planning fee will be charged once the client has agreed to the financial planning relationship, and the client will then be charged a monthly financial planning retainer to maintain the services.

General Information

Mutual Fund Fees

All fees paid to GreensView for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds ("ETFs") in which we may invest your assets. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. Our fees pay for our services in advising you as to the investment of your assets including, among other things, our assistance in deciding which mutual fund or funds may be most appropriate to your financial condition and objectives. The mutual fund fees and expenses, on the other hand, pay for the costs of managing and investing the fund's portfolio of investments. A client could invest in a mutual fund directly, without our services, but the client would not receive the benefit of our services. Clients should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Clients should also understand that mutual funds offer a variety of share classes, some including fees that are more expensive than others and some with no fees. The fund prospectus will describe these fees

Additional Fees & Expenses

In addition to the advisory fees we charge, you are also responsible for fees and expenses charged by custodians and imposed by broker/dealers. These addition charges include transaction charges,

custodial fees, and commission costs. Please refer to the “Brokerage Practices” section of this Form ADV (Item 12) for additional information.

Advisory Fees In General

You should be aware that similar advisory services may or may not be available from other registered (or unregistered) investment advisors for similar or lower fees.

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

GreensView does not have any performance-based fee arrangements, and consequently, does not participate in any side-by-side management.

Item 7 – Types of Clients

Clients eligible to enroll in the GreensView Intelligent Portfolios Program include individuals, IRAs, and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$5,000. The minimum account balance to enroll in the tax-loss harvesting feature is \$50,000.

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

Methods of Analysis—Creation and Maintenance of the Model Portfolios

As part of the wealth management process, we attempt to measure a your risk tolerance, time horizon, goals and objectives through an interview and data-gathering process in an effort to determine an investment plan or portfolio to best fit your investor profile. The specific investment strategies we choose to use may be based upon a number of different factors and determined by the type of investor. Your participation and delivery of accurate and complete information are critical to our process. We will assist you in developing gathering all the relevant information, however, we rely on and ultimately dependent upon you delivering us accurate and complete financial and other information.

GreensView may recommend that you authorize the discretionary management of a portion or all of your assets based upon your stated investment objectives. Potentially, we may recommend the use of a third party manager as sub-advisor to certain portions of your portfolio. When selecting a sub-advisor for a client, we shall review information about the manager such as its disclosure statement and/or material supplied by the manager or independent third parties for a description of the sub-advisor's investment strategies, past performance and risk results to the extent available. GreensView shall continue to render services to the client relative to the discretionary selection of third party managers, as well as the monitoring and review of your account performance and investment objectives.

Numerous publicly available sources of economic, financial and investment research are used by GreensView in servicing your accounts. We also utilize asset allocation software and historical performance modeling software in managing client accounts.

While we make every effort to consider tax consequences, the sale of investments may cause you taxable gain(s) or loss (es). We urge you to consult independent personal accountants about tax consequences resulting from transactions or any particular investment held in their account.

Investment Strategies

GreensView utilizes the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities for certain strategies and composites with the idea of holding them in the client's account for longer than a year. Typically, we employ this strategy when:

- We believe the securities to be currently undervalued
- We may desire to have exposure to a particular asset class over time as a core holding within a portfolio
- The security's liquidity or transaction cost does not lend itself to active management such as in the case of private equity or debt
- We believe the underlying fundamentals and/or market share for a security are superior to its competitors.

Short-term purchases. For certain strategies and composites, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a favorable price swing. Short-term purchases may involve higher brokerage and other transaction costs than other investment strategies.

Risk of Loss

Investment returns are not guaranteed, and our clients may lose money on their investments. We ask that our clients work with your GreensView advisor to help understand the clients' tolerance for risk. Our securities analysis and investment strategy methods rely, where possible and as appropriate, on credit ratings prepared by independent rating agencies and on financial statements audited by independent public auditors. We assume that rating agencies and auditors are in fact independent and that they perform their services in accordance with applicable legal and professional standards. In addition, we rely on company management, investment banks, and attorneys to make accurate and unbiased representations about these securities in public filings and other publicly-available information. We believe this data has been obtained from sources believed to be reliable and is accurate to the best of our knowledge. However, we recognize that some data may be incorrect and there is always a risk that our analysis will be compromised by inaccurate or misleading information, or that unanticipated circumstances will lead to unanticipated adverse results. Risks of loss may also arise from unanticipated circumstances.

From time to time, we have clients who have invested in different classes of securities of the same issuer. If the issuer defaults or enters bankruptcy, we typically will be involved in negotiations on behalf of different classes of securities, which could include conflicting interests. In that situation, we will seek

to act in the best interests of our clients, regardless of the client's holdings. As discussed above, GreensView's advisory services are tailored specifically to its individual client's risk tolerances and return objectives. As such, the risks of loss associated with our advisory services are largely dependent upon the methods of analysis, composites, and/or investment strategies employed upon a particular client's behalf. Nonetheless, in all cases, a risk of loss will accompany any potential for profit. Clients are encouraged to discuss the specific risks of loss which accompany various methods of analysis and/or investment strategies or composites with their GreensView investment advisor representative.

Clients invested in equities will have a percentage of their investments allocated to small and value stocks, including micro-cap securities. Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small/micro-cap company stocks may fluctuate relatively more in price. In general, smaller capitalization companies are also more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources. There is a risk that value stocks may perform differently from the market as a whole and following value-oriented investment strategies may cause client portfolios to at times underperform equity funds that use other investment strategies.

Many of our strategies have clients who are invested in foreign securities. These investments may be affected unfavorably by changes in currency rates or exchange control regulations, or political or social instability in the particular foreign country or region. Investments in emerging markets may develop unevenly and may never fully develop. Furthermore, emerging securities markets have lower trading volumes and less liquidity than developed markets.

Our investment strategies may utilize various fixed income asset categories. Because the value of client investments in fixed income will still fluctuate, there remains the risk that clients will lose money. Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of fixed income securities owned by client portfolios to rise or fall. Fixed income securities are also subject to credit risk, or the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value, and thus, impact the investment portfolio's performance. Fixed income securities are also subject to interest rate risk because a change in market interest rates may adversely affect the value of fixed income securities. When interest rates increase, the value of fixed income securities generally will fall, and longer-term securities will be affected to a greater degree. In addition, some fixed income strategies may utilize foreign government debt, and as a result, there is the risk that (a) the governmental entity that controls the repayment of government debt may not be willing or able to repay the principal and/or to pay the interest when it becomes due, due to factors such as political considerations, the relative size of the governmental entity's debt position in relation to the economy, cash flow problems, insufficient foreign currency reserves, the failure to put in place economic reforms required by the International Monetary Fund or other multilateral agencies, and/or other national economic factors; (b) governments may default on their debt securities, which may require holders of such securities to participate in debt rescheduling; and (c) there is no legal or bankruptcy process by which defaulted government debt may be collected in whole or in part.

Item 9 – Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Our firm has no reportable legal or disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations and Conflicts of Interest

Licensed Insurance Agents. Some firm personnel also serve as licensed insurance agents. The recommendation that a client purchase an insurance commission product from a firm employee in his individual capacity as an insurance agent presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. You are under no obligation to purchase any insurance commission products from a GreensView employee. You should note, however, that the insurance services provided by individuals employed at GreensView are strictly those of the representative, not of GreensView Wealth Management. GreensView does not receive commissions or other compensation for the sales of any insurance products. Furthermore, clients are reminded that they may purchase insurance products recommended by GreensView through other non-affiliated insurance agents.

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

Code of Ethics

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct. GreensView Wealth Management and each GreensView employee owe a duty of loyalty, fairness, and good faith towards our clients, and have a fiduciary duty to adhere not only to specific provisions of the Code of Ethics, but to the general principles that guide the Code of Ethics. Our firm also maintains and enforces written policies reasonably designed to prevent the Adviser or any person associated with Adviser from misusing material non-public information to comply with Section 204A of the Investment Advisers Act. Neither the Adviser, nor any related person of the Adviser, will recommend, buy, or sell securities within client accounts which the Adviser or a related person of the Adviser may have a material financial interest.

You may request a copy of the firm's Code of Ethics by contacting its Chief Compliance Officer, Christopher L. Payne at 859-578-2433.

Personal Trading & Other Conflicts of Interests

To address the potential for conflict of interests, we have adopted a Code that applies to our representatives who have access to non-public information relating to advisory client accounts ("Access Persons"). Access Persons must take the following steps when making personal securities transactions:

- Report initial holdings
- Certify all holdings on a quarterly and annual basis
- Pre-clear certain transactions

The Code prohibits Access Persons from using knowledge about advisory client account transactions to profit personally, directly or indirectly, by trading in his/her personal accounts. In addition, an Access Person who has discretionary authority over client accounts must generally pre-clear his/her trades or obtain prior authorization from the Adviser's Chief Compliance Officer before executing a trade. Unless an enumerated exception exists, the Code also prohibits Access Persons who have discretionary authority over client accounts from executing a security transaction for their personal accounts during a blackout period that can extend from one to seven days before or after the date that a client transaction in that same security is executed.

Other procedures regarding other potential Conflicts of Interest include:

- **Confidentiality**

Our firm prohibits the use of material non-public information. Where we have access to nonpublic information, all employees are reminded that such information may not be used in a personal or professional capacity and is subject to the firm's insider trading policy.

- **Gifts**

Typically gifts of a nominal value may be offered or received. Gifts in excess of a nominal value must be declined or returned. GreensView's Political Contributions Policy, which aims to ensure compliance with SEC Rule 206(4), however, places significant restrictions on the ability of GreensView supervised persons to make political contributions.

- **Outside Business Activities**

Any outside business activity involving a non-affiliated company must be pre-approved.

Our Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of our employees 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.

Participation or Interest in Client Transactions

Our firm representatives may engage in securities transactions for their own accounts, including the same or related securities that are recommended to or owned by clients of the Adviser. These transactions may include trading in securities in a manner that differs from, or is inconsistent with, the advice given to clients of the Adviser, and the transactions may occur at or about the same time that such securities are recommended to or are purchased or sold for client accounts. This creates a potential for a conflict between the interest of the clients and the interests of the Adviser and/or its representatives. We will ensure, however, that such transactions are in compliance with all under the provisions under Section 206(3) of the Advisers Act governing principal transactions to advisory clients. GreensView is prohibited from engaging in agency cross transactions.

Item 12 – Brokerage Practices

The custodians and brokers we use

GreensView does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We are independently owned and operated and not affiliated with any qualified custodian. Custodians will hold your assets in a brokerage account and buy and sell securities when instructed. We allow multiple custodians to be used as custodian/broker, and for each one, you will decide whether to open your account by entering into an account agreement directly with them. We may assist in the account opening process, but we do not open the account for you.

Client accounts enrolled in the Program are maintained at, and receive the brokerage services of, Charles Schwab & Co., a broker-dealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use Charles Schwab & Co. as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with Charles Schwab & Co. by entering into a brokerage account agreement directly with Charles Schwab & Co. We do not open the account for the client. If the client does not wish to place his or her assets with Charles Schwab & Co., then we cannot manage the client’s account through the Program. Charles Schwab & Co. may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Platform.

Products and Services Available to Us From Charles Schwab & Co. Under The Program

Schwab Advisor ServicesTM (formerly Schwab Institutional) provides the firm’s clients and the firm with access to its institutional brokerage-trading, custody, reporting, and related services-many of which are not typically available to retail customers. Schwab also makes available various support services. Some of those services help manage or administer clients’ accounts; while others help the firm manage and grow our business. Here is a more detailed description of our preferred custodians’ support services:

Services that benefit you. Charles Schwab & Co.’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through each custodian include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by the firm’s clients. Charles Schwab & Co.’s services described in this paragraph generally benefit you and your accounts.

Services that may not directly benefit you. The custodian also makes available to GreensView other products and services that benefit us, but may not directly benefit your or your accounts. These products and services assist us in managing and administering your accounts. They include investment research, both the custodian owns and that of third parties. We may use this research to service all or some substantial number of our clients’ accounts. In addition to investment research, CS&Co. also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;

- Provide pricing and other market data;
- Facilitate payment of our fees from our clients' accounts; and
- Assist with back-office functions, recordkeeping, and client reporting.

Services that generally benefit only us. Charles Schwab & Co. offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events;
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support.

Schwab may provide some of these services themselves. In other cases, the custodian will arrange for third-party vendors to provide the services to the firm. The custodian may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide the firm with other benefits such as occasional business entertainment of our personnel.

How we select brokers/custodians

We seek to recommend custodians and brokers that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us and our clients.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. This creates an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving the custodians' services that benefit our business and the receipt of services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and brokers is in the best interests of our clients and that the selection is

primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/custodians") and not custodial services that benefit only us.

Research and Other Soft Dollar Benefits

We do not receive or other products or services other execution from a broker-dealer or a third party in connection with client securities transaction ("soft dollar benefits").

Brokerage for Client Referrals

We do not consider, in selecting or recommending broker-dealers, whether we or a related person receives client referrals from such broker-dealer or third party.

Best Execution and Directed Brokerage

As indicated above, you are required to use Charles Schwab & Co. as custodian and broker/dealer if you participate in the Program. GreensView has an obligation to seek the best execution for client transactions. Best execution means the most favorable terms for a transaction based on all relevant factors, including, without limitation, quality of execution, services and research provided, commission rates, volume discounts offered, execution capability, reliability, and responsiveness of the broker/dealer. Therefore, we may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of our clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

If you participate in this program, you may not request that we direct brokerage elsewhere for transaction execution. For the SIP program, all brokerage transactions for securities will be routed to Schwab for execution, which may not always obtain as favorable a price as another broker-dealer. Program monitoring and trading are subject to systems and technology constraints and availability and, while unlikely, may not take place daily.

Order Aggregation

Charles Schwab & Co. may aggregate purchase and sale orders for ETFs across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Platform.

Item 13 – Review of Accounts

Investment Management

GreensView monitors client portfolios on a daily basis through the use of portfolio accounting software to monitor allocations. By request or on at least an annual basis, we also conduct reviews of clients' accounts. Reviews are performed by examining each client's stated investment objectives and guidelines, as outlined in their account agreements or investment policy statements. More frequent reviews may be triggered by material changes in such factors as the client's individual circumstances (marriage/divorce, job change, children, etc.), or increased/decreased risk due to external factors, such as in the market, political, or economic environments.

In addition to the statements and confirmations of transactions that clients receive from their custodian(s), we generally provide reports summarizing account performance, balances, and holdings on a quarterly basis depending on the client's preference. Clients may also access their accounts online directly through the custodian or through our website.

Financial Planning

Financial planning reviews may occur at different stages depending on the nature and the terms of each client's specific financial planning engagement.

Item 14 – Client Referrals and Other Compensation

As a matter of firm practice, we do not pay referral fees to affiliated or independent persons or firms ("Solicitors") for introducing certain clients to us.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under Item 12 Brokerage Practices. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Item 15 – Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Charles Schwab & Co. to deduct advisory fees directly from your account. This is the case for accounts in the GreensView Intelligent Portfolios Program. Schwab maintains actual custody of client assets. You will receive account statements directly from the custodian at least quarterly. They will be sent to the email or postal mailing addresses you provided to Schwab. You should carefully review those statements promptly when they receive them. We also urge you to compare the account statements that you receive from the custodian with the periodic portfolio reports that you will receive from us.

Item 16 – Investment Discretion

As part of our investment management services, GreensView typically receives discretionary authority from you at the outset of our advisory relationship. Granting us discretionary authority permits us to make investment decisions and place trades in your account without first consulting you. Our discretionary authority gives us the ability to do the following without first contacting you:

- Determine the security to buy or sell
- Determine the amount of the security to buy or sell
- Exchange or convert securities, including money market instruments
- Determine the timing of securities transactions
- Select a broker to effect securities transactions
- Determine the terms of transaction, including commission amounts (if any)

We are granted discretionary authority when you sign a discretionary agreement with our firm. You will have the ability limit the authority through restrictions, written instructions, or based on your new account paperwork or investment policy statements. You may change or amend limitations at any time by providing us with written instructions or revising your initial account paperwork.

GreensView seeks to manage portfolios with similar instructions or guidelines in the same way. In some instance, accounts with restrictive guidelines (for example, avoiding certain asset classes or types of securities) will be unable to participate in aggregated orders and can be disadvantaged by the market impact of trading for other accounts.

If you do not grant GreensView discretionary authority, we are limited to make periodic recommendations to you regarding which securities to be purchased or sold and the size of the transactions. You will ultimately be responsible for implementation of those recommendations and the timing of the transaction.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to, and does not vote proxies on behalf of, advisory clients. You will retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

GreensView has no additional financial circumstances to report. We do not solicit fees of more than \$1,200 per client, six months or more in advance of services rendered under any circumstances. We are therefore not required to include a financial statement with this brochure. GreensView has not been the subject of a bankruptcy petition.

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