

Greenwich Wealth Management LLC®

Client Relationship Summary

(CRD# 142820) March 31, 2024

INTRODUCTION

Our firm, Greenwich Wealth Management, LLC., is registered as an investment adviser with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

Services: We offer investment advisory services to retail investors. These services include wealth management which is a combination of financial planning and investment management. We work closely with you to identify your investment goals and objectives, as well as risk tolerance and financial situation in order to develop an investment approach.

Accounts, Investments, and Monitoring: We provide services to individual, joint, retirement, trust and estate accounts, foundations, endowments, and charitable organizations. Investments primarily include stocks, bonds, mutual funds, exchange traded funds, closed end funds and options in constructing portfolios. As part of our services, we monitor portfolios and investments accounts on a regular and continuous basis. We also meet with you at least annually, or more frequently, depending on your needs.

Investment Authority: We provide our services on a perpetual and discretionary basis. We execute investment recommendations in accordance with your investment objectives without your prior approval for each specific transaction. Our engagement will continue until you notify us otherwise in writing. We also offer our services on a non-discretionary basis, which means we are required to obtain consent prior to executing trades. For clients with a non-discretionary relationship, the client is responsible for the ultimate decision regarding the purchase or sale of investments. However, buy and sell orders for non-discretionary clients may not be eligible for aggregation with other clients, which could result in differences in pricing and execution.

Account Minimums & Other Requirements: We have a stated \$1,000,000 minimum account or relationship size minimum in order for you to open/maintain an account or establish a relationship. This minimum can be waived for a variety of reasons.

Additional Information: For more detailed information on our relationships and services, please see Item 4 –Advisory Services, Item 13 – Review of Accounts and Item 7 –Types of Clients of our Form ADV Part 2A available via our firm’s Investment Adviser Public Disclosure Page.

CONVERSATION STARTERS: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay?

Asset-Based Fees:

Fee Structure

The annual fee for Portfolio Management Services will be based on a percentage of assets under management, according to the schedule below:

Portfolio Value	Maximum Fee
≤ \$1,000,000	1.25%/year
≥ \$1,000,001 to \$5,000,000	1.00%/year
> \$5,000,000	0.90%/year

GENERAL INFORMATION ON SERVICES AND FEES

In certain circumstances, fees may be negotiable. GWM may charge different clients receiving the same services different fees. The above are the firm’s standard fee schedules.

Fees may be negotiable based on the amount of assets under management or the length or scope of the client relationship.

The annual fee for portfolios will be determined on a sliding scale and based on the amount of assets under management and the level of client services.

Depending on the custodial platform, either GWM or the custodian will calculate the advisory fee based on the value of the assets held in the client’s account and the annual rate.

GWM generally uses Interactive Brokers, LLC (IB) as custodian for client assets. For clients who utilize IB the advisory fee will be calculated and deducted by Interactive Brokers based on the value of the assets held in the client’s account at the end of each business day. The daily fee will be equal to the annual fee divided by the number of business days in the calendar year.

Other Fees & Costs: In addition to our advisory fee, you will also be responsible for custody fees, account administrative fees, fees and expenses related to mutual funds and exchange-traded funds, and applicable securities transaction fees. Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

INTERACTIVE BROKERS

In addition to the advisory fee, client accounts at Interactive Brokers will pay a transaction charge to IB for each trade affected in their account. The exact cost of the transaction charge will be directly debited from the client's account by the custodian without a markup.

GWM does not receive commission from IB for client transactions

Transaction costs at IB are low by industry standards and typically less than one cent per share on US equities. Pricing for common asset classes is below. For a full detailed description of pricing and a list of charges for other investment products please visit <https://www.interactivebrokers.com/en/index.php?f=1590&p=stocks2> and select the Tiered Pricing Structure Tab.

SCHWAB

In addition to the advisory fee, client accounts at Charles Schwab will pay a transaction charge to Charles Schwab for each trade affected in their account. The exact cost of the transaction charge will be directly debited from the client's account by the custodian without a markup. For more specific on fees and minimums please visit: <https://www.schwab.com/pricing#bcn-table--table-content-74561>

The more assets there are in a retail investor's account, the more the retail investor will pay in fees, and the IAR will therefore have an incentive to encourage the retail investor to increase the assets in his or her account. This is a conflict of interest.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information, please see Item 5. Fees and Compensation in the GWM Brochure and the GWM Investment management Client Agreement for additional information regarding the section above.

CONVERSATION STARTERS: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser?

How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts, because they can affect the investment advice we provide. Here is an example to help you understand what this means:

We will recommend that you open your account with a specific custodian, where we maintain an institutional relationship and may receive economic benefits. The receipt of economic benefits presents a conflict of interest and can influence our recommendation of the custodian to you. However, you ultimately decide where to open your accounts. Choosing a different custodian may result in the loss of quality of service and/or ability to obtain favorable prices.

Additional Information: For more detailed information, please see Item 10 –Financial Industry Activities and Affiliations, Item 12 –Brokerage Practices and Item 14 –Client Referrals and Other Compensation of our Form ADV Part 2A available via our firm's Investment Adviser Public Disclosure Page.

CONVERSATION STARTERS: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals are compensated on the revenue generated from the accounts they service directly. This means financial professionals have an incentive to increase the asset size in the relationship or solicit new business. GWM also receives a portion of these fees.

DISCIPLINARY HISTORY

"DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?" "YES"

YES, GREENWICH WEALTH MANAGEMENT LLC HAS A DISCIPLINARY DISCLOSURE. VISIT INVESTOR.GOV/CRS FOR A FREE AND SIMPLE SEARCH TOOL TO RESEARCH US AND OUR IAR'S.

TO REPORT A PROBLEM TO THE SEC, VISIT INVESTOR.GOV OR CALL THE SEC'S TOLL-FREE INVESTOR ASSISTANCE LINE AT (800) 732-0330. IF YOU HAVE A PROBLEM WITH YOUR INVESTMENTS, INVESTMENT ACCOUNT OR A FINANCIAL PROFESSIONAL, CONTACT US IN WRITING AT 45 EAST PUTNAM AVENUE, SE 128, GREENWICH, CT 06830.

ADDITIONAL INFORMATION

We encourage you to seek out additional information. You can find additional information about our investment advisory services by viewing our Form ADV Part 2A available via our firm's Investment Adviser Public Disclosure Page or by visiting www.greenwichwealth.com. You can request up to date information and a copy of our client relationship summary by contacting us sullivan@greenwichwealth.com or (203) 618-0103.

CONVERSATION STARTERS: Who is my primary contact person? Is he or she a representative of an investment advisor? Who can I talk to if I have concerns about how this person is treating me?