



Introduction

Graystream LLC (“we”, “us”, or “our”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for investors to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment adviser, and investing.

What investment services and advice can you provide me?

Services: We operate as an internet advisor and offer investment advisory services through web-based or mobile applications, primarily an investment management service (the “Service”), to retail investors with whom we have entered into investment advisory agreements (“Clients”, the “Client”, “you”, or “your”).

Accounts: The Service is provided to Clients using a separately managed account in the Client’s name, custodied at a third-party brokerage firm (the “Custodian”). For individual account types, Clients are required to use the custodial services of Alpaca Securities LLC. For account types other than individual, Clients are required to use the custodial services of Altruist Financial LLC.

Investments: We construct portfolios for Clients using individual stocks and exchange traded funds (ETFs) across various asset classes, specifically equities, commodities, bonds, and digital assets. While these are the primary investment products offered through our Service, we do not make available or offer advice only with respect to proprietary products, or a limited menu of products or types of investments.

Monitoring: Client portfolios are managed and monitored continuously via proprietary algorithms which are reviewed manually for correctness on a regular basis. Portfolios are typically rebalanced daily but may be rebalanced more or less frequently in certain situations if deemed appropriate.

Restrictions: At present, we only extend the Service to U.S., UK and 40 other countries, however, we intend to offer the Service globally in the future. There is a minimum funding of \$500 for Clients to open an investment account and partake in our Service. Our status as an internet adviser requires that the majority of our Clients access our Service through our web-based application which is highly reliant upon technologies provided by our principal Custodian. Thus, under normal circumstances, most Clients will be limited to the brokerage and custodian services of our principal Custodian.

Authority: We solely offer our Service on a discretionary basis meaning we have the authority manage Clients’ portfolios without prior approval of each individual transaction. Our investment recommendations are based on information provided by the client including, but not limited to, financial status, employment status, risk tolerance, and time horizon. The accuracy of this information is crucial in ensuring the suitability of the Service is in line with the Client’s investment objectives.

For additional information, please see Items 4 & 7 of our Form ADV Part 2A brochure found [here](#).

CONVERSATION STARTERS. Ask your financial professional—

- 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?

What fees will I pay?

Asset-Based Fees: Clients using our Service will pay an asset-based management fee of 24% annually. This fee is prorated and charged monthly (2% per month) based upon the average value of the Client’s portfolio from the preceding month. You should understand that the more assets in your account, the more you will pay us in advisory fees. Thus, we have an incentive to increase the amount and value of assets in Clients’ accounts.

Other Fees: In addition to our asset-based management fee, the Client will also be responsible for 1) fees associated with the use of our principal Custodian's platform such as margin fees, regulatory fees, and wire transfer fees, 2) fees associated with the investment products use in the course of our Service such as ETF expense ratios and 3) the tax-burden incurred on any investment profits generated using our Service.

For additional information, please see Item 5 of our Form ADV Part 2A brochure found [here](#).

CONVERSATION STARTERS. Ask your financial professional—

- 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?

We only make money from the asset-based management fees Clients pay us for our Service. When we act as your investment advisor, we must act in your best interest and not put our interest 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 you. Here is an example to help you understand what this means: we are compensated in proportion to the amount of assets we have under management. Thus, we may have a greater incentive to focus on acquiring new and wealthier customers than focusing on providing you the utmost quality investment management service.

For additional information, please see Item 11 of our Form ADV Part 2A brochure found [here](#).

CONVERSATION STARTERS. Ask your financial professional—

- 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 owners of the firm and are compensated based on the revenue generated from the Service, which is distributed in accordance with our firm's partnership agreement.

Do your financial professionals have legal or disciplinary history?

Yes. Visit investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

CONVERSATION STARTERS. Ask your financial professional—

- As a financial professional, do you have any disciplinary history? For what type of conduct?

You can find additional information about our investment advisory services by viewing our Form ADV Part 2A found [here](#) or by visiting www.graystreamcapital.com.

CONVERSATION STARTERS. Ask your financial professional—

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?