

**INTEGRIS, LLC**  
**SEC File Number: 801-70877**

**FIRM BROCHURE**

**FORM ADV PART 2A**  
**DECEMBER 2011**

**ITEM 1: COVER PAGE**

**FIRM NAME:** Integris, LLC  
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**This brochure provides information about the qualifications and business practices of Integris, LLC (“Integris”). If you have any questions about the contents of this Firm Brochure, please contact us at 858.997.2773 or email [bkullback@integrisllc.net](mailto:bkullback@integrisllc.net). 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 Integris, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Please note that the use of the term “registered investment adviser” and description of Integris, LLC and/or our associates as “registered” does not imply a certain level of skill or training. You are encouraged to review this Firm Brochure for more information on the qualifications of our firm and its employees.**

## **ITEM 2: MATERIAL CHANGES**

There are several material changes to report regarding Integris since our last update filed with the United States Securities and Exchange Commission in March, 2011.

Since our last filing, Integris launched several private investment vehicles which are designed to provide clients with greater access and diversification by increasing buying power for certain alternative strategies that are consistent with a client's investment objectives and risk tolerances.

In addition, we launched Integris Focus Fund, LP and Integris Foundation Partners, LLC -- pooled investment vehicles that further enhance our clients' ability to access alternative investments via unique managers, securities and asset classes in both taxable as well as non-taxable structures. These funds provide certain clients with greater access, diversification, and liquidity by pooling their purchasing power.

On July 1, 2011, Mr. David L. Eigen joined Integris as a 25% or more shareholder of the firm (see Item 4 (A) below).

*Integris, LLC is required to advise clients of any material changes to our Firm Brochure ("Firm Brochure" or "Brochure") from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.*

### **ITEM 3: TABLE OF CONTENTS**

Item 4. Advisory Business.....	4
Item 5. Fees and Compensation .....	6
Item 6. Performance-Based Fees and Side-By-Side Management.....	9
Item 7. Types of Clients and Account Requirements.....	9
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss.....	9
Item 9. Disciplinary Information.....	11
Item 10. Other Financial Industry Activities and Affiliations.....	11
Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading....	12
Item 12. Brokerage Practices.....	13
Item 13. Review of Accounts or Financial Plans .....	15
Item 14. Client Referrals and Other Compensation .....	15
Item 15. Custody .....	16
Item 16. Investment Discretion .....	16
Item 17. Voting Client Securities .....	16
Item 18. Financial Information.....	17
Item 19. Requirements for State-Registered Advisers .....	17

## **ITEM 4: ADVISORY BUSINESS**

### **A. Description of the firm:**

Integris, LLC (“Integris”) is an independent wealth advisory firm that serves as a multi-family office for a select group of high net worth families. We work with clients to design and implement a highly customized investment strategy that is specifically tailored to their risk tolerance and unique goals. Integris is a limited liability company formed in the State of California in 2006. Mr. Richard J. Effress and Mr. David L. Eigen are the two principal operating executives of the firm.

### **B. Description of the types of advisory services offered:**

Integris, LLC (“Integris”) provides continuous and ongoing wealth advisory and supervisory services primarily on a non-discretionary basis largely to high-net-worth individuals, families, and related entities, including family offices, trusts, private foundations, and estates and charitable entities associated with such individuals and families.

Integris is completely independent, and oversees investment and risk management strategy for our clients. Our wealth advisory services include developing a strategic asset allocation based on clients’ investment objectives, conducting due diligence on securities and managers across the spectrum of asset classes and strategies, implementing the allocation via asset, security and manager selection, and monitoring the portfolio on an ongoing basis. Through the strategic allocation process, Integris selects and allocates the asset classes for each client based upon appropriate levels of risk and return. We offer an “open architecture” which allows us to bring the full spectrum of managers and investment strategies across traditional and alternative asset classes to a client portfolio. Integris provides advisory services for either a client's entire portfolio or only an agreed-upon portion of the client's portfolio.

Securities we may recommend may include, without limitation, common or preferred stock, fixed income, REITs, limited partnerships, convertible stocks or bonds, options, warrants, rights, corporate, municipal or government bonds, and notes or bills consistent with a client's suitability, overall investment strategy, and risk tolerance.

Depending on client needs and objectives, we may recommend utilizing independent third-party managers who have full investment discretion and trading authority and have sole responsibility for the implementation of their portion of the client investment portfolio with respect to clients’ accounts for which investment discretion has been delegated by the client and accepted by the third party manager.

Additionally, Integris clients may also have access to unaffiliated privately pooled investment vehicles or private investments that are characterized by varying liquidity provisions, including private equity, venture capital or other alternative investments such as hedge funds, private investment partnerships, and “fund of funds” (collectively “Alternative Assets”). Any Alternative Asset investments that we recommend will generally require clients to subscribe directly with the investment manager, and an investment in any Alternative Asset investment will require clients’ prior consent. To the extent that clients are invested directly or indirectly in such Alternative Assets, the managers of such funds will have their own investment practices of the types described herein, and those independent investment practices will be described in such managers’ Form ADVs or such funds’ offering documents.

Since our last filing, Integris launched several private investment vehicles which are designed to provide clients with greater access and diversification for certain alternative strategies that are consistent with a client’s investment objectives and risk tolerances.

In addition, we launched Integris Focus Fund, LP and Integris Foundation Partners, LLC -- pooled investment vehicles that further enhance our clients’ ability to access alternative investments via unique managers, securities and asset classes in both taxable as well as non-taxable structures. These funds provide certain clients with greater access, diversification, and liquidity by pooling their purchasing power.

Interests in the pooled and private investment vehicles are privately offered pursuant to Regulation D under the Securities Act of 1933, as amended, where applicable. The pooled and private investment vehicles currently rely on an exemption from registration in reliance on Section 3(c)(1) of the Investment Company Act of 1940, as amended. If eligible, Integris may recommend that certain clients invest in the pooled and private investment vehicles. All relevant information, terms and conditions relative to the vehicles, including the compensation received by Integris or an affiliate, withdrawal rights, minimum investments, qualification requirements, suitability, risk factors, potential conflicts of interest, are set forth in the relevant confidential private offering documents which each investor is required to receive and execute prior to being accepted as an investor in the pooled and private investment vehicles.

Given varying objectives, suitability, risk factors, and qualifications for participation in the pooled and private investment vehicles, Integris may give advice or take action with respect to these vehicles that differs from that for individual client accounts.

Integris also provides comprehensive reporting services which can incorporate all of the client’s investment assets and financial picture, including those investments that we do not manage for the client.

C. Explanation of whether (and, if so, how) we tailor our advisory services to the individual needs of clients and whether clients may impose restrictions on investing in certain securities or types of securities:

We invest substantial time up-front to understand our clients' goals and needs. Our sole mission is helping each client achieve investment objectives in a fashion consistent with the client's unique circumstance, risk tolerance and long-term financial goals.

After learning of the client's investment goals and objectives and performing a detailed analysis of the current portfolio, Integris will develop a customized asset allocation strategy specifically designed for each client. The allocation presentation will include a target strategic allocation as well a tactical allocation that reflects the current investment environment.

While Integris is an investment advisor registered with the SEC, we generally do not exercise any investment discretion over client assets except for certain accounts of related persons and the firm's pooled and private funds. We will direct, with clients' prior approval of each transaction, the investment and reinvestment of the assets in their accounts. Clients may choose to follow or disregard any recommendation, advice or suggestion made by Integris, and may impose restrictions on the types of investments to be held in the portfolio.

D. Participation in wrap fee programs:

Integris does not offer wrap fee programs.

E. Disclosure of the amount of client assets we manage on a discretionary basis and the amount of client assets we manage on a non-discretionary basis:

As of December 31, 2011, we had \$234,320,943 in assets under management of which \$60,595,980 was on a discretionary basis and \$173,724,963 was on a non-discretionary basis. With the exception of certain accounts of related persons and the firm's pooled and private investment vehicles, Integris advises clients on a non-discretionary basis only.

**ITEM 5: FEES AND COMPENSATION**

We are required to describe our brokerage, custody, fees and fund expenses so you will know how much you are charged, and by whom, for our advisory services provided to you.

A. Description of how we are compensated for our advisory services provided to you:

The standard fee for the non-discretionary advisory services provided by Integris shall be a percentage of the market value of the Investment Portfolio.

The standard advisory fee (“Advisory Fee”) due each quarter is 0.1875% (or 0.75% on an annual basis) for the first \$10 million under our supervision; 0.15% (or 0.60% on an annual basis) for the next \$25 million under our supervision; and 0.125% (or 0.50% on an annual basis) for all additional amounts. Our minimum quarterly fee is \$12,500 (or \$50,000 on an annual basis).

At our discretion, and with client request and/or agreement, Integris may perform advisory services at a fixed fee, a lower rate and/or a lower minimum quarterly fee.

The entire Advisory Fee for the first year (twelve months) is deemed earned at execution of the Investment Management Agreement (at a minimum value based on the value of investment portfolio assets) and is not subject to refund. Our clients are advised that client investment portfolios may be subject to additional advisory and other fees and expenses beyond those charged by Integris, such as certain charges imposed by unaffiliated third parties including, but not limited to, custodian(s) and third party managers. The Advisory Fee shall be prorated for capital contributions made prior to the beginning of a calendar period, but will not be prorated for withdrawals made in the prior calendar period. The Advisory Fees are in addition to the fees and expenses described in Item 5 (C) below.

With respect to the pooled and private investment vehicles administered, advised and/or managed by Integris, each investor in the vehicles will be responsible for the following fee:

- (a) an investor who is an existing Integris advisory client, with an asset-based advisory fee structure – annual Management Fee rate of 0.25% of the net asset value of such investor’s capital account, and
- (b) all other investors – annual Management Fee rate of either 1% or 1.25% depending on the fund.

Integris does not receive **any** compensation – hard or soft dollars – from third party managers, brokers, custodians, or any other service providers. One-hundred percent of our compensation comes directly from clients. We do not receive or accept any indirect forms of compensation or commissions through the purchase or sale of securities or other investment products.

B. Description of whether we deduct fees from *client* assets or bill *clients* for fees incurred:

Integris does not have direct access to client assets and has no authorization to deduct fees directly from client accounts. We either invoice clients directly, or invoice third-party custodians for Management Fees due, and send duplicate invoices to clients.

C. Description of any other types of fees or expenses *clients* may pay in connection with our advisory services, such as custodian fees or mutual fund expenses:

Advisory clients will be responsible for all expenses including but not limited to (a) trading commissions and other payments to custodians, brokers, and investment managers generated by a client's investment portfolio, (b) legal and accounting fees, (c) tax preparation fees, and (d) margin interest and expenses related to short sales and clearing and settlement charges. Integris does not receive any portion of these fees.

Fees to Integris do not include any fees due by clients to third-party money managers that provide services to the client or the underlying fees and expenses associated with the mutual funds, index funds, exchange traded funds, or alternative investments in which client assets are invested.

Investors in the pooled and private investment vehicles are responsible for expenses including but not limited to administration and custody fees by independent service providers, audit and tax preparation fees, and other administrative and investment research related fees.

We may help clients seek and secure a new brokerage or investment manager relationship, and may recommend specific brokers and investment managers for clients to consider. Clients have no obligation to work with any brokers or investment managers we may recommend. In any case, we will review and advise clients on ways to improve the execution of transactions for client investment portfolio account(s), considering trading commissions, fees, trade execution and other relevant aspects of the relationship. Integris will not receive any portion of the commissions and/or transaction fees charged by brokers and investment managers.

D. Management Fee payment schedule and details:

The Advisory Fee for advisory clients is payable quarterly in *advance*, based on the market value of the Investment Portfolio as of the last day of each calendar quarter as valued by the custodian(s), and is subject to change upon 30 days written notice.

If the client investment management agreement starts or ends at a date other than the end of a calendar quarter, the fee for that quarter shall be prorated accordingly. If a client contributes additional capital to the investment portfolio on a date other than the first day of a calendar quarter, the investment portfolio will be charged a prorated portion of the Advisory Fee for that calendar quarter with respect to such contribution, based on the number of days remaining in that calendar quarter and based on the net market value of the contributed capital on the date of such contribution. Upon our mutual agreement for purposes of administrative ease, the Advisory Fee *may* be payable for six months in advance (i.e. two invoices delivered per year instead of four).



E. Compensation from sale of securities or other investment products:

Integris does not receive **any** compensation – hard or soft dollars – from third party managers, brokers, custodians, or any other service providers. One hundred percent of our compensation comes directly from clients. We do not receive or accept any indirect forms of compensation or commissions through the purchase or sale of securities or other investment products.

**ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Integris does not currently charge performance fees. Performance based fees are those based upon a share of capital gains on or capital appreciation of the assets of a client.

**ITEM 7: TYPES OF CLIENTS AND ACCOUNT REQUIREMENTS**

Integris provides continuous and ongoing advisory and supervisory services to individuals, family offices, trusts, estates and charitable and family investment entities associated with such individuals and family offices. While we do not currently have a minimum account size requirement for advisory clients, we do require a minimum quarterly fee of \$12,500 (or \$50,000 on an annual basis).

With respect to the pooled investment vehicles advised and/or managed by Integris, minimum investment amounts are generally \$500,000, but we reserve the right to accept a smaller minimum investment.

**ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS**

A. Description of the methods of analysis and investment strategies used in formulating investment advice or managing assets:

Integris employs a range of methods to evaluate investment opportunities and associated risks. These methods include fundamental analysis, some aspects of technical analysis and study of price trends, and analysis of economic, market, and industry cycles and trends. Additionally we invest substantial time in the fundamental analysis of macro-economic factors and trends including but not limited to global equity markets, interest rates, yield curves, corporate and sovereign credits, commodities, and currencies.

Investment advice provided by Integrus to clients is based on a number of factors that may include, but are not necessarily limited to, the client's investment objectives, risk tolerances, time horizons, liquidity needs, expected returns, and an assessment of current economic and market views expressed by economists, analysts, banks, securities firms, and other investment professionals. Investment strategies and allocations are developed for each client, with an attempt to achieve diversification by investing over time, across asset classes, within asset classes, across various investment styles, and by diversifying internationally and by currency.

The qualitative factors considered by Integrus to determine the suitability of independent third-party money managers may include, but are not limited to, investment strategy, market specialization, reputation, performance record, philosophy, continuity of management, service to clients, operational capabilities, evaluation of external custodians, administrators and auditors (where applicable), financial controls, minimum dollar investment requirement, and fees.

Integrus generally advises clients to invest in a diversified portfolio across major asset classes with a long-term time horizon intended to meet the client's long-term financial objectives. Additionally, our advisory objectives are to realize preferable tax rates on long-term capital gains (where prudent to do so) and to manage trading expenses. We may recommend selling securities that meet our appreciation objectives or experience unfavorable fundamental or technical developments in shorter time spans. From time to time, and where suitable to client circumstances and preferences, we may recommend short sales, margin transactions, covered option writing, or option purchases.

*Please note: Investing in securities involves risk of loss that clients should be prepared to bear.*

#### B. Material risks of the methods of analysis and investment strategies:

Investing in securities involves risk of loss that clients should be prepared to bear. Material risks of investing in securities include loss of capital, loss of liquidity, correlation to other asset classes, major security or sector specific adverse event, and counterparty risks. Our goal is to advise clients on risk management and help build a diversified investment portfolio so as to limit the impact of these various material risks. Our recommended investment strategies do not involve frequent trading of securities.

#### C. Primary recommended security type and associated risks:

Integrus advocates diversification and risk management across major asset classes and security types. We neither maintain a security-type bias nor do we focus primarily on a particular security type.

## **ITEM 9: DISCIPLINARY INFORMATION**

Integris has nothing to disclose under this item.

*We are required to disclose whether there are 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. There are a number of specific legal and disciplinary events that we must presume are material for this Item. If our advisory firm or a management person has been involved in one of these events, we must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in our or the management person's favor, or was reversed, suspended or vacated, or (2) the event is not material.*

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

Integris does not have any direct or indirect affiliations with other financial firms, and we do not receive any compensation or commission from other financial firms.

Other than Integris pooled and private investment vehicles, we generally will not accept investments from any client in an investment vehicle of any kind in which either Integris or its related persons have a financial interest. Exclusive of the pooled and private investment vehicles, in the exceptional case that Integris does accept such an investment, Integris will forsake any financial gain (commissions or fees) related to the client. Such financial gain will either accrue to other partners in the vehicle (none of which will be Integris affiliates), or the client will not be charged for fees or sponsor incentives that would result in such a gain. Following the termination of the investment management agreement, Integris may solicit and accept investments from prior clients in investment vehicles in which Integris or its related persons have a financial interest. Additionally, prior to entering into an advisory agreement with Integris, clients may have previously invested in an investment vehicle in which Integris or its related persons have a financial interest. In such event, the client may maintain such an investment if that is in the client's best interest. In that case, and in the event of an investment decision or event impacting such investment that requires advisory services, Integris will in good faith attempt to advise the client (if such advice is requested) and point out any conflicts of interest.

**ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT  
TRANSACTIONS AND PERSONAL TRADING**

A. Code of Ethics:

Integris has adopted a Code of Ethics pursuant to Rule 204A-1 of the Advisers Act that sets forth standards of conduct and federal securities law requirements applicable to all supervised persons. The Code of Ethics is predicated on the principle that Integris owes a fiduciary duty to its clients. In addition to providing general guidelines overseeing client professional services, the code stresses the avoidance of actual or perceived conflicts of interest. Accordingly, Integris expects all associated persons to act with honesty, integrity and professionalism and to adhere to federal securities laws. Integris and its related persons are required to adhere to the Code of Ethics at all times. Integris and its related persons must (i) place client interests ahead of Integris'; (ii) engage in personal investing that is in full compliance with Integris' Code of Ethics; and (iii) avoid taking advantage of their position. Integris will provide a copy of its Code of Ethics to any client or prospective client upon request.

Clients or prospective clients of Integris may request a copy of the firm's Code of Ethics by contacting William J. Kullback at [bkullback@integrisllc.net](mailto:bkullback@integrisllc.net).

B. If you or a *related person* recommends to *clients*, or buys or sells for *client* accounts, securities in which you or a *related person* has a material financial interest, describe your practice and discuss the conflicts of interest it presents:

Because the Integris pooled and private investment vehicles generally collect an administrative or management fee that is paid to us, the recommendation that a client become an investor in these investment vehicles presents us with a potential conflict of interest. In order to mitigate this conflict of interest, we disclose to each client the costs, benefits and implications of using these vehicles with respect to a client's investment objectives. Under no circumstances would clients be obligated to invest in Integris vehicles.

Other than the pooled and private investment vehicles, we do not have financial interest in any securities, investment products or transactions that we may recommend to clients. We do not act as principals in securities transactions with clients and do not have any economic interest in recommending buying or selling securities for client accounts.

C. If you or a *related person* invests in the same securities that you or a *related person* recommends to *clients*, describe your practice and discuss the conflicts of interest this presents:

Integris and its related persons may invest in the same securities that we recommend to clients. We are not obligated to recommend or to refrain from recommending any security that Integris and its related persons may buy or sell for their own accounts or for the accounts of any other client. Integris and its related persons may purchase for themselves securities or other investments which one or more clients own, previously owned, or will own in the future.

As part of the asset allocation report delivered to clients on a quarterly basis, Integris will note in the report which securities, if any, are held by Integris or its related persons. Integris will address as appropriate with its clients, and in the normal course of business, which securities and investments are appropriate for a given client and why such an investment strategy may differ from that of Integris or related persons.

D. If you or a *related person* recommends securities to *clients*, or buys or sells securities for *client* accounts, at or about the same time that you or a *related person* buys or sells the same securities for your own (or the *related person's* own) account, describe your practice and discuss the conflicts of interest it presents:

If it is appropriate to buy or sell a security at the same time for both a client and a related person, combined orders may be placed and if any order is not filled at the same price, prices obtained may be allocated among accounts on an average basis. Placing combined orders is not required. There may be times when the sale or purchase of a security for a related person may precede, occur at the same time, or follow the sale or purchase of a security for a client, subject to the overriding principle that the interests of clients must come before the interests of Integris and its related persons.

## **ITEM 12: BROKERAGE PRACTICES**

A. Description of the factors that we consider in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation:

While Integris maintains relationships with several large broker-dealers, we do not require that clients transact with these broker-dealers. We maintain an open platform on which clients may transact with a number of different broker-dealers, thus minimizing potential conflicts of interest. If a client has preferred broker or investment manager relationships in place and wants to maintain those relationships, we will work with the client and such brokers and investment managers as the client directs. We may also help clients seek and secure new brokerage or

investment manager relationships, and may recommend specific brokers and investment managers for clients to consider. Recommendations will be made if appropriate for the client and are based on (a) the financial position of the broker, (b) the services and products offered by the broker, (c) the fees, commissions and expenses charged by the broker, and (d) our experience working with a given broker. Clients have no obligation to work with any brokers or investment managers we may recommend.

A(1). Research and soft dollar benefits:

Integris does not direct client transactions or commissions in return for soft dollar benefits with brokers or investment managers. We do not receive benefits (for no additional cost to the firm) such as financial software, data services, analytical packages, premium news services, or subscription services of any kind. In certain cases, we may receive proprietary research at no additional cost based, in part, on referrals to a particular broker or the prospect of referrals to a particular broker. This research generally will be used to service all of our clients, but management fees, brokerage commissions or other payments by a specific client may help us secure access to research that is not used in advising that particular client's investment portfolio. While we strive to help clients obtain the best execution (taking into consideration execution capabilities, bid-offer spreads, commission rates, and nature of the security being traded), the fact that we receive research from broker-dealers may nevertheless pose a potential conflict of interest.

A(2). Brokerage for *Client* Referrals:

Integris or its related persons do not receive client referrals from a broker-dealer or third party as a quid-pro-quo for recommending that broker-dealer or third party. However, Integris may make or receive referrals from broker-dealers or third-parties with which it or its clients conduct, may conduct or have conducted business.

A(3). Directed Brokerage:

Integris does not require that clients execute transactions through a specific broker-dealer. We do not have any financial or economic relationship with any broker-dealer.

B. Discuss whether and under what conditions the firm aggregates the purchase or sale of securities for various *client* accounts:

Integris performs wealth advisory services for various clients on a non-discretionary basis with the exception of certain accounts of related persons and the firm's pooled and private investment vehicles. Non-discretionary clients may provide Integris execution authority once recommendations have been approved. In cases where we are executing trades for multiple clients at a single broker or investment manager, we may recommend the purchase or sale of the same securities for several clients at about the same time, and we may (but are not obligated to) combine client orders to allow us to negotiate favorable prices or lower commission rates and other transaction charges. Although such aggregation potentially could be either advantageous or disadvantageous to any one or more clients, it is affected only when we believe that to do so will be in the best interest of the affected accounts. We will direct the relevant broker or investment manager to allocate securities so purchased or sold, as well as the expenses incurred in the transaction, in a manner that we consider equitable. In the event transactions for Integris or its related persons are aggregated with client transactions, potential conflicts may arise (please see Item 11 D for more details).

### **ITEM 13: REVIEW OF ACCOUNTS**

Integris monitors advisory client accounts on an on-going basis and provides clients with a quarterly asset allocation report ("Quarterly Report") reflecting the market value of the combined assets in client investment portfolios and performance for the quarter and year-to-date, in both cases subject to the availability and accuracy of information provided by clients, broker-dealers, and third party managers. Note that the Quarterly Report includes an updated portfolio allocation analysis that includes both short-term and longer-term recommendations, and may be prepared in three-month cycles other than calendar quarter ends. With respect to reporting to investors in our pooled and private investment vehicles, such reports include regular monthly account statements prepared and sent directly from the administrator of the private funds. We also provide our clients with certain fund performance reports that are prepared and distributed directly by Integris.

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

We are compensated solely by advisory fees from our clients and management fees from the pooled and private investment vehicles. Integris and its related persons do not receive any direct or indirect compensation, rebates, or economic benefit for client referrals. We do not currently have solicitation or compensation agreements with individuals, financial intermediaries, or other third parties who may be sources for client referrals. Integris may consider and has discussed the payment of compensation to potential referral sources. In such an event, any such compensation will be fully disclosed to the client prior to and/or as part of entering into an Investment Management Agreement.

### **ITEM 15: CUSTODY**

Our clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for their accounts. Clients are strongly urged to carefully review those confirmations and statements. We also provide our investment advisory clients with a statement report no less frequently than quarterly, unless mutually agreed upon, summarizing their account holdings and activity. To the extent that we provide clients with periodic account statements or reports, the client is strongly encouraged to compare any statement or report provided by us with the account statements received from account custodians.

### **ITEM 16: INVESTMENT DISCRETION**

Integris provides wealth advisory services on a non-discretionary basis with the exception of certain accounts of related persons and the firm's pooled and private investment vehicles. We assist clients with implementation of an agreed upon investment strategy. Integris may recommend various securities, third-party money managers or categories of mutual funds, exchange traded funds, and other investment products (e.g. hedge funds, commodities, REITs, and private equity) that we believe are suitable for the client and consistent with the client's overall investment strategy, risk tolerance, and long-term financial objectives. In connection with a client's asset allocation plan, we will recommend investment products that we believe are compatible with the client's unique circumstances and will assist the client in implementing appropriate changes to the client's investment portfolio.

### **ITEM 17: VOTING *CLIENT* SECURITIES**

As a matter of firm policy, Integris does not vote proxies on behalf of its clients. Therefore, although the firm may provide investment advisory services relative to client investment assets, the client and/or its brokers, or custodians maintain the responsibility for (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted; and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings, or other type events pertaining to the client's investment assets. Clients are responsible for instructing each prime broker, broker, or custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.



Integris does not offer any consulting assistance regarding proxy issues to clients.

### **ITEM 18: FINANCIAL INFORMATION**

A. If we require or solicit prepayment of more than \$1,200 in fees per *client*, six months or more in advance, we must include a balance sheet for our most recent fiscal year:

Integris does not require or solicit prepayment of more than \$1,200 in fees per *client*, six months or more in advance.

B. If we are an SEC-registered adviser and have *discretionary authority* or *custody* of *client* funds or securities, or we require or solicit prepayment of more than \$1,200 in fees per *client*, six months or more in advance, we must disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to *clients*:

This section is not applicable to Integris.

C. If we have been the subject of a bankruptcy petition at any time during the past ten years, we must disclose this fact, the date the petition was first brought, and the current status:

This section is not applicable to Integris.

### **ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

This item is not applicable to Integris.