



FORM ADV PART 2 BROCHURE

This brochure provides information about the qualifications and business practices of Integrus Wealth Management, LLC as of 12/31/13. If you have any questions about the contents of this brochure, please contact us at 831-333-1717, info@integruswealth.com, 456 Washington St. Monterey, CA 93940 or www.integruswealth.com. Additional information about Integrus Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Integrus Wealth Management is 111336.

Integrus Wealth Management is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training. 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.

March 20, 2014

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Advisory Business

Form ADV Part 2A, Item 4

Integris Wealth Management, LLC (Integris) was founded in 1997 and is an SEC registered investment adviser managing \$183 million on a discretionary basis for 82 clients as of 12/31/2013 and \$240 thousand on a non-discretionary basis. Integris is independent, fee-only, team-based, and conducts comprehensive financial planning and investment management in a fiduciary capacity. Integris' mission is "be the firm we would hire for ourselves."

Clients retain Integris to advise on most aspects of their financial lives. It is understood that Integris and each client will work together in a partnership-like relationship. Clients are responsible for articulating their concerns, needs and other personal financial information. Clients retain control over all decisions, unless they specifically delegate that authority to Integris. Integris performs all analysis, articulates recommendations and implements its clients' decisions. Additionally, Integris will endeavor to coordinate with clients' other professional advisors, such as accountants, insurance professionals, and attorneys to present clients with coordinated advice. Such coordination does not include wrap program participation.

Integris' services include:

Investment Management services:

- Assessment of clients' goals and risk tolerance
- Development of an Investment Policy Statement
- Making investment recommendations
- Implementation, ongoing management, and periodic reporting of client portfolios

Financial Sustainability Review services:

- Assessment of clients' goals and financial profile
- Analysis of the adequacy of clients' financial resources to satisfy goals
- Interpretation of the data and recommendations for action

Legacy and Incapacity Planning services:

- Verification of the existence, date and location of legacy and incapacity planning documents
- Detailing of dispositive terms of will and trust(s), IRAs, 401(k)s, annuities, and life insurance
- Identification of trustees, executors, guardians, powers of attorney and other "key people"
- Verification of titling of significant assets
- Discussion of findings, and verification that the documents achieve clients' intent

Integris is not an attorney and cannot provide legal advice. Integris' primary intent with Legacy Planning is to facilitate clients' own understanding of their goals and needs so that they can more effectively communicate with their legal advisor.

Risk Management services:

- Assess adequacy of existing insurance coverage for catastrophic loss or other financially devastating event
- Highlight areas of exposure
- Provide recommended solutions for exposure areas

Integris is not insurance licensed, does not sell insurance products, and is not allowed, by statute, to provide advice for a fee on existing insurance contracts.

Other Financial Planning services:

Integris provides unlimited consultation on any other aspect of its clients' financial life that either clients or Integris may identify as needing attention.

To the extent Integris determines that such issues are outside its expertise, then Integris will endeavor to identify, introduce to its clients, and coordinate on behalf of those clients with another advisor or advisors who

do possess such expertise. Said other advisors may charge fees which would be the responsibility of the client. Integris will not incur such fees without its clients' prior approval.

Integris' advice is fully customized for each client. Each client's pre-existing investment portfolio, investment tax status, risk tolerance, retirement needs and resources, insurance policies and estate plan are reviewed and advice is rendered accordingly. Investment holdings can be similar from client to client; however the proportions of each will be specific to the client accounting for any pre-existing positions that will be retained, tax implications and risk tolerance. The client retains ultimate decision power and can mandate restrictions on the investment management.

Gifford R. Lehman, CFP®, MBA

Born: 1951

Professional Background

Integris Wealth Management, Monterey, CA

1997 - Present

Founding Partner and Advisor

Providing fee-only financial planning and investment management services.

Twenty-First Securities, New York, NY

1990 - 1999

Institutional Securities Broker

Specializing in hedging and arbitrage strategies for large corporate and institutional investors. A majority of these strategies were designed to solve a tax problem or take advantage of a tax opportunity. These strategies involved an intricate interplay between risk management, taxation, and corporate reporting. In addition to tax oriented strategies, Giff was very involved in marketing managed investment strategies. These were exclusively hedged or arbitrage investments for pension funds and other sophisticated investors.

Bankers Trust Company, New York, NY

1978 - 1990

Vice President

Held various positions in investment research, investment consulting, portfolio management, product development and marketing. Involved in a wide variety of investment products including both active and passive management; money markets, equity, and fixed income; and the use of derivatives to create enhanced return, hedged, and arbitrage products.

Education and Professional Designations

Certified Financial Planner™ (CFP®) designee

1998

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals. Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

College for Financial Planning 1997 - 1998
CFP® Professional Certification Program

Carnegie-Mellon University 1975 - 1977
Master of Business Administration (Finance and Quantitative Methods)

University of Washington 1970 - 1974
Bachelor of Arts (Speech Communication)

Professional Affiliations

Financial Planning Association
Member 2001 - Present

National Association of Personal Financial Advisors
Member 2004 - Present

Non-Profit Affiliations

California State University Monterey Bay Foundation
Investment committee member 2007 - Present

Monterey Peninsula College Foundation
Investment committee member 2009 - Present

Monterey Museum of Art
Development committee member 2013 - Present

Michael A. Leavy, CFA Born: 1962

Professional Background

Integris Wealth Management, Monterey, CA 2004 - Present
Partner and Advisor
Providing fee-only financial planning and investment management services.

Independent Consultant and Investor 1999 - 2004
Consulted on the legal structure for a multi-manager hedge fund, did analysis and portfolio allocation consulting for a family office of \$800 million, created business plan and strategy to expand non-profit counseling program for disadvantaged children and developed investment/trading strategy focused on real estate stocks and investment of personal capital in the strategy.

Barra RogersCasey Asset Services 1997 - 1999
Director and Senior Portfolio Manager
Designed multi-manager equity market neutral fund for institutional investors, launched fund with internal seed investment capital in June 1998, created and managed the investment process, legal fund structuring, negotiation of fees and advisory agreements, and handled business development with institutional investor prospects. Investment work included manager analysis and due diligence, asset allocation, and ongoing portfolio management and risk monitoring.

Independent Investment Research	1996
Focused on quantitative modeling to identify potential investment processes.	
Citibank Global Asset Management	1993 - 1996
Director and Senior Portfolio Manager	
Assisted senior Citibank officer in creation of a hedge funds-of-funds business. Launched several multi-manager funds totaling over \$400 million in assets by 1996, with investment in a broad range of securities and derivatives markets spanning equities, fixed income, currencies, and commodities. Involved in manager analysis and due diligence, asset allocation and portfolio construction, risk management, legal structuring, development and management of operational infrastructure, and business development.	
Quantilogic Asset Management	1988 - 1993
Assistant Portfolio Manager	
First non-owner employee, joined three months after the company was formed. Participated in growth of firm's client base from one \$400 million account to thirteen accounts with over \$1.3 billion under management. Designed accounting, portfolio management, and risk monitoring systems and procedures, including analysis of the risk exposure from derivatives positions. Assumed portfolio management and trading responsibilities, interacted with current and prospective clients to discuss and explain the investment program.	
Education and Professional Designations	
Association for Investment Management and Research	1988 - 1991
Chartered Financial Analyst (CFA)	
<p>Since it was first introduced in 1963, the Chartered Financial Analyst® designation, or CFA charter, has become the most respected and recognized investment credential in the world. Earning the CFA charter demonstrates mastery of the skills most needed for investment analysis and decision making in today's fast-evolving global financial industry. To earn the CFA charter you must have four years of qualified investment work experience; you must become a member of CFA Institute (the global association of investment professionals that administers the CFA charter), pledging to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; you must apply for membership to a local CFA member society; and you must complete the CFA Program. The CFA Program is a globally recognized, graduate level curriculum that provides a strong foundation of the real-world investment analysis and portfolio management skills and practical knowledge needed in today's investment industry. It also emphasizes the highest ethical and professional standards. The Program is organized into three levels, each culminating in a six-hour exam. CFA Program candidates report dedicating in excess of 300 hours of study per level. Completing the entire Program is a significant challenge that takes most candidates between two and five years.</p>	
University of California, Santa Barbara	1980 - 1984
Bachelor of Arts (Economics)	
Professional Affiliations	
CFA Institute	1989 - Present
Member	
Securities Analysts of San Francisco	1989 - Present
Member	
Non-Profit Affiliations	
Hospice Foundation	2007 - Present
Investment committee member	
Harmony at Home	2004 - Present
President of Board	
Legal Services for Seniors	
Board member	
	2011 - Present

Kevin R. Mahoney, CFP®

Born: 1973

Professional Background

Integrus Wealth Management, Monterey, CA

2009 - Present

Partner and Advisor

Providing fee-only financial planning and investment management services.

Fisher Investments, Woodside, CA

1999 - 2009

Group Vice President

Held numerous positions including: Investment Counselor to high net-worth clients, Group Manager of Investment Counselors, Assistant Director of Client Services, Group Vice President of the Investment Counselor department, Group Vice President of the sales department, and Group Vice President of the information technology department.

Morgan Stanley, San Francisco, CA

1996 - 1999

Financial Advisor

Provided investment management services for individuals and their families to design and implement investment plans to achieve their life goals.

Education and Professional Designations

Certified Financial Planner™ (CFP®) designee

2011

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- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals. Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

University of California Extension at Santa Cruz

2008 - 2010

Certificate in Financial Planning

University of California at Santa Barbara

1993 - 1995

Bachelor of Arts in Law and Society

Professional Affiliations

Financial Planning Association 2009 - Present
Member

Non-Profit Activities

Hospice Foundation 2011 - Present
Committee member

Carmel Public Library Foundation 2012 - Present
Board member

Carmel River School Site Council 2013 - Present
Council member

Allison F. Mosher, CPA

Born: 1985

Professional Background

Integrus Wealth Management, Monterey, CA 2011 - Present
Advisor
Providing fee-only financial planning and investment management services.

Rothstein, Kass, & Company, LLP, San Francisco, CA 2007 - 2010
Senior Associate
Provided audit and tax services to investment companies.

Education and Professional Designations

Certified Public Accountant 2011
Certificate Number 111120

University of California at Santa Barbara 2003 - 2007
Bachelor of Arts (Business Economics emphasis Accounting)
Minor (Chemistry)

Professional Affiliations

American Institute of CPAs 2011 - Present
Member

CalCPA 2011 - Present
Member

Fran H. Mosher

Born: 1948

Professional Background

Integrus Wealth Management, Monterey, CA 2013 - Present
Associate
Providing fee-only financial planning and investment management services.

Language Line Services, Monterey, CA 2006 - 2012
VP of Human Resources
Providing human resource services.

FM Associates, Salinas, CA 2003 – 2006
Human Resources Consultant
Providing human resources services.

Monterey Credit Union , Monterey, CA VP of Human Resources Providing human resources services.	1998 – 2003
Education and Professional Designations	
Leadership Monterey Peninsula	2000
University of Massachusetts	1971 – 1972
University of San Francisco Human Resources and Organizational Development	
North Shore Community College , Monterey, CA Associate Degree	1966 – 1968

Fees and Compensation

Form ADV Part 2A, Item 5

Integris' fee is tied to the investment portfolio size (assets under management). This fee is assessed at a rate of 1% of assets under management for the first \$2,000,000. Assets in excess of \$2,000,000 up to \$5,000,000 will be charged at a rate of 0.75%. Assets in excess of \$5,000,000 will be charged at a rate of 0.5%.

The minimum annual fee is \$10,000. Because of this minimum annual fee, clients having little to no assets managed by Integris may be able to obtain comparable services for a lower fee from other providers.

In addition, there is a one-time Start Up Fee of \$1,500, due upon the signing of the Client Agreement.

Integris may on occasion apply a differing fee rate and/or minimum fee.

This fee structure is predicated on the assumption that the assets under management include client's entire portfolio of financial assets, and that client's financial assets comprise a significant portion of client's overall investment holdings. If client holds significant financial or other investment assets upon which Integris will not be charging asset based fees, Integris may impose an additional fee for the provision of financial planning services. Client will not be subject to such a fee unless Integris and client have agreed in advance, and in writing, to such a fee.

This fee is billed in arrears, at each quarter end, based upon the value of the portfolio at quarter end, with the following two exceptions:

- If contributions or withdrawals of \$50,000 or greater occur during the quarter, the fee is pro-rated on the amount of the contribution or withdrawal.
- If the client retains Integris on any date other than the first day of a quarter, that quarter's fee is pro-rated accordingly.

The fee schedule is subject to change upon thirty (30) days notice.

Integris may on occasion agree to provide financial planning and/or investment advice on an hourly fee basis.

Integris can bill client fees or deduct fees from client accounts upon the client's written authorization. Regardless the method, clients will be provided a quarterly invoice setting forth the fee calculation and a quarterly statement reflecting the deduction of fees if deducted.

All fees paid to the Integris for asset management services are separate and distinct from the fees and

expenses charged by mutual funds, exchange traded funds, variable annuities, or other managed investments. These fees and expenses are described in each fund's prospectus. Fund and annuity subaccount fees always include a management fee. Sometimes they involve a 12-b-1 fee or other distribution fees, redemption or purchase fees, mortality and expense fees, load fees, or surrender charges. Integris receives no portion of these fees. In addition, brokerage firms charge transaction fees and sometimes account fees. Again, no portion of these fees is received by Integris.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

Not applicable. Integris does not accept performance-based fees.

Types of Clients

Form ADV Part 2A, Item 7

Integris works with affluent individuals and families looking for clarity and confidence from a comprehensive financial planning and investment management relationship. Integris additionally may provide investment advice for pension plans and non-profit accounts.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Integris believes optimal portfolio results are obtained by first determining what mix of asset types (e.g. large US stocks, foreign stocks, high yield bonds, real estate stocks, intermediate term bonds, etc) produces the highest expected return for the least amount of expected risk, consistent with the client's investment horizon and tolerance for risk. Once the optimal mix of asset types is determined, Integris then selects individual investments, typically no-load mutual funds and exchange traded funds that provide the most cost effective and tax efficient implementation of that asset mix.

In addition to the financial press and research and ratings prepared by others, Integris utilizes software and data developed by well-respected firms such as Morningstar.

Integris are primarily oriented toward long-term investments to minimize both transaction costs and taxable events. Integris will generally not recommend trading, short selling, margin transactions, or options trading except with the most sophisticated clients, and even with these clients such transactions will be rare.

There is a risk of loss in investing. While Integris aims to mitigate loss by building very diversified portfolios, some risk is inherent. It is Integris' belief that growth assets can decline roughly 50% at their worst and that preservation assets can decline roughly 10% at their worst.

Disciplinary Information

Form ADV Part 2A, Item 9

Neither Integris, nor any of its staff or management has been named in any criminal or civil action by any entity including domestic court, foreign court, military court, the SEC, any other federal, state or foreign regulatory agency or self-regulatory agency.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

Integris has no other financial industry activities or affiliations. Specifically, Integris' only business activity is comprehensive financial planning and investment management on behalf of its clients. Additionally, Integris is purposefully not a registered broker-dealer, futures commission merchant, commodity pool operator, or commodity trading advisor to ensure the firm's independence and objectivity. Additionally, Integris has no affiliations with such entities nor lawyers, insurance agents, pension consultants, real estate agents, or limited partnerships. Integris also receives no compensation from investments selected and is compensated solely and directly from clients.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Form ADV Part 2A, Item 11

Integrity

Integris shall offer and provide professional services with integrity. Integris may be placed by clients in positions of trust and confidence. The ultimate source of such public trust is our personal integrity. In deciding what is right and just, Integris should rely on our integrity as the appropriate touchstone. Integrity demands honesty and candor, which must not be subordinated to personal gain and advantage. Within the characteristic of integrity, allowance can be made for innocent error and legitimate difference of opinion; but integrity cannot co-exist with deceit or subordination of one's principles. Integrity requires Integris to observe not only the letter but also the spirit of this Code.

Objectivity

Integris shall be objective in providing professional services to clients. Objectivity requires intellectual honesty and impartiality. It is an essential quality for any professional. Regardless of the particular service rendered or the capacity in which Integris functions, Integris should protect the integrity of its work, maintain objectivity, and avoid subordination of judgment that would be in violation of this Code.

Competence

Integris shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which the firm is engaged. Firm members are competent only when they have attained and maintained an adequate level of knowledge and skill, and apply that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation or client referral is appropriate. In addition to assimilating the common body of knowledge required and acquiring the necessary experience, firm members shall make a continuing

commitment to learning and professional improvement.

Fairness

Integris shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers and shall disclose conflict(s) of interest(s) in providing such services. Fairness requires impartiality, intellectual honesty, and disclosure of conflict(s) of interest(s). It involves a subordination of one's own feelings, prejudices, and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Confidentiality

Integris shall not disclose any confidential client information without the specific consent of the client unless in response to proper legal process, to defend against charges of wrongdoing or in connection with a civil dispute between Integris and client. A client, by seeking the services of Integris, may be interested in creating a relationship of personal trust and confidence with the firm. This type of relationship can only be built upon the understanding that information supplied to Integris will be confidential. In order to provide the contemplated services effectively and to protect the client's privacy, Integris shall safeguard the confidentiality of such information.

Professionalism

Integris' conduct in all matters shall reflect credit upon the profession. Because of the importance of the professional services rendered by Integris, there are attendant responsibilities to behave with dignity and courtesy to all those who use those services, fellow professionals, and those in related professions. Integris also has an obligation to cooperate with fellow wealth managers to enhance and maintain the profession's public image and to work jointly with other wealth managers to improve the quality of services. It is only through the combined efforts of all wealth managers in cooperation with other professionals, that this vision can be realized.

Diligence

Integris shall act diligently in providing professional services. Diligence is the provision of services in a reasonably prompt and thorough manner. Diligence also includes proper planning for and supervision of the rendering of professional services.

Other

Integris requires each staff member to report personal investment transactions quarterly and personal investment holdings annually.

Firm members' personal investments are generally consistent with those of its clients, thereby holding many of the same securities. This ensures firm members' interests are aligned with clients. Conflicts are avoided by firm members not actively trading in these same securities and only trading in them under normal and necessary circumstances such as rebalancing or needed withdrawals. The impact of any conflicting trades is also greatly mitigated by our investment philosophy of strictly using mutual funds and exchange traded funds, both of which are large, diversified asset pools that experience little to no impact by single trades.

Brokerage Practices

Form ADV Part 2A, Item 12

Integris predominantly uses the brokerage services of Charles Schwab & Co., Inc. (Schwab) for client accounts eligible for Schwab custody. Integris searched for a brokerage firm that was financially stable, offered competitive client trading costs, had an institutional service platform to accommodate client and Integris needs

and a firm that offered high-end client reporting and online capabilities.

This arrangement has no financial impact on Integris as Integris receives no soft dollar benefits (services in exchange for directing trades to the broker-dealer) or client referrals from Schwab or any other broker-dealer.

Integris does not block trade. All trading is highly customized by individual client. If Integris had trades affecting numerous clients a block trade would be considered and closely coordinated with the Schwab trading desk.

Review of Accounts

Form ADV Part 2A, Item 13

Client accounts are reviewed on at least a quarterly basis, but normally more often. Additionally, firm recommended holdings are reviewed daily and a client meeting to review client portfolios, Investment Policy Statement and risk tolerance is conducted at least annually for each client. Clients' financial plans are also reviewed periodically. All firm members are involved in some parts of these reviews. Firm members are Gifford Lehman, Mike Leavy, Kevin Mahoney, Allison Mosher, and Fran Mosher.

Clients receive reports from the custodian of clients' assets and Integris. The custodian will provide monthly statements reflecting holdings and activity. Additionally, the custodian will provide year-end 1099s and gain and loss reports. Integris will provide quarterly statements reflecting holdings, weightings and performance.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

Not applicable. No person or entity provides an economic benefit to Integris for providing investment advice and no compensation is provided any entity for providing Integris with client referrals.

Custody

Form ADV Part 2A, Item 15

Integris does not take custody of client funds. Clients are encouraged to compare quarterly statements from Integris with those provided by the custodian to ensure accuracy. Client are further encouraged to bring any discrepancies to the attention of Integris.

Investment Discretion

Form ADV Part 2A, Item 16

Integris makes recommendations to each client regarding which mutual funds and securities to buy and/or sell, and how much of each mutual fund or security to buy and/or sell. Integris does not take custody of client assets. By signing a limited power of attorney clients grant Integris authority to enter transactions on the client's behalf. This authority does not permit Integris to take possession of client funds other than quarterly fees and does not permit Integris to distribute funds other than to the client without the client's written authorization.

Voting Client Securities

Form ADV Part 2A, Item 17

Integris does not vote client proxies. Therefore, although Integris may provide investment advisory services relative to client investment assets, clients maintain exclusive 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. Integris and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Financial Information

Form ADV Part 2A, Item 18

Not applicable. Required only for firms which bill in advance.

Y67Requirements for State-Registered Advisors

Form ADV Part 2A, Item 19

Not applicable. Integris is registered with the SEC.