

Item 1: Cover Page**Form ADV Part 2A: Firm Brochure**

Including, Brochure Supplement (Part 2B Form ADV)

Integre Asset Management, LLC

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This brochure provides information about the qualifications and business practices of Integre Asset Management, LLC (“Integre”). If you have any questions about the contents of this brochure, please contact Francois Coeytaux, Chief Operating Officer and Chief Compliance Officer at: 212-838-2300, or by email at: fcoeytaux@integreAM.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. Registration with the SEC or a state securities authority does not imply a certain level of skill or training.

Additional information about Integre Asset Management, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This Item of the Brochure will discuss only specific material changes that are made to the Brochure since the last Annual Update and provide clients with a summary of such changes.

As of November 7, 2014, Integre Advisors LLC changed its legal name to Integre Asset Management, LLC, and this change along with domain name change are reflected throughout this document.

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Item 4: Advisory Business

Firm Description

Integre Asset Management, LLC (“Integre”) was established in 2003 under the name Integre Advisors LLC. Integre has its principal office at 767 Fifth Avenue, 15th Floor, New York, NY 10153. Integre offers multiple strategies to invest primarily in the equities markets.

Integre’s world wide web site is www.integreAM.com.

Principal Owners

The Principal owner of the firm is Emanuel Weintraub.

Types of Advisory Services

Integre offers investment supervisory services for individuals, pension and profit sharing plans, trusts, estates, charitable organizations and corporations. Integre’s advice is limited to investments in equities and, to a lesser extent, fixed income, mutual fund and ETF opportunities. Some clients may impose restrictions on the investments that may be made for their accounts.

Integre does not make use of leverage in the strategies it employs, however some clients may occasionally use margins in their accounts temporarily.

Our Integre investment strategies include the following:

Domestic Equity

The Domestic Equity Strategy has been managed since inception by Manny Weintraub. Manny has over 20 years of portfolio management experience and has developed his own systematic approach to investing, contrarian but risk averse. Proprietary screens and financial analysis are applied to identifying companies with an asymmetric risk-reward ratio, wherein each company's likely perceived upside is disproportionately large compared to its perceived worst-case scenario downside.

Integre offers two portfolios designed to provide investment choices to our clients based on their risk preference.

I. Diversified: our core offering

II. Concentrated: a subset of the 25 names in the Diversified Portfolio which has had greater volatility and returns since its inception in March, 2004.

Both the Diversified and Concentrated Portfolios are invested in the same fashion:

- Initial equal weighted positions (4% target position for the Diversified and 6.66% target position for the Concentrated).
- Industry concentration is limited to 20%.

- Approximate sector weighting based on highest potential return consistent with prudent diversification, not based on S&P 500 weightings.

Our goal is to have the opportunity to participate in the potentially high returns of the equity market while at the same time limiting downside risk through disciplined stock selection. Throughout our four-step process, we take specific steps to uncover opportunities and to limit risk.

Stock Price Dislocation

Within the universe of U.S. companies with a market cap of over \$400 million, we look for those stocks that are experiencing some form of dislocation, such as a substantial decline in price or a spin off from a parent company. This helps us limit risk by reducing the value we are asked to pay for our part-ownership of a company.

High Returns on Invested Capital

Within that segment, we screen for those companies with high returns on invested capital. This can work to limit risk as these companies have the potential to buy shares alongside us with the excess capital they generate.

Assessment

We then qualitatively assess why this high return business has declined in price. Is this the peak of a cycle, and are their high-returns unsustainable? Has a fundamental shift occurred in their business? This assessment can reduce the risk of investing in a company in the early phases of a long decline.

Best and Worst Case Financial Scenarios

If we think the company still has good long-term prospects in spite of a recent decline, we create a best and worst case company financial model and assign best and worst case valuations to our three-year-out forecast. This results in high and low future stock price targets. The worst case models force us to confront the bear case for a potential investment - compelling us to ask, "Is the risk worth the potential reward?"

If, in the final analysis, we can buy a high-return company with good prospects at a double-digit discount to the midpoint of the high and low price targets, then the stock is a buy. This process enables us to buy what we believe are growth companies when they are priced at a value level. Simply put, we invest where we believe the best risk/reward can be found.

Small Cap Domestic Equity

The Small Cap Domestic Equity Strategy is managed by Manny Weintraub and utilizes the same contrarian, but risk averse, approach to investing as our other Domestic Equity Strategies.

Proprietary screens and financial analysis are applied to identifying companies with an asymmetric risk-reward ratio, wherein each company's likely upside is disproportionately large compared to its worst-case scenario downside.

The Small Cap Domestic Equity Strategy is invested as follows:

- Initial positions are consistently sized at 1.5 -3.0%, and portfolios will typically hold no more than 5 names in a particular industry.
- Sector concentration is limited to 30%.
- Approximate sector weighting based on highest potential return consistent with prudent diversification, not based on Russell 2000 weightings.

Our goal is to have the opportunity to participate in the potentially high returns of small cap stocks while at the same time limiting downside risk through disciplined stock selection. Throughout our four-step process, we take specific steps to seek to uncover opportunities and seek to limit risk.

Stock Price Dislocation

Within the universe of U.S. companies with a market cap less than \$3.5 billion, we look for those stocks that are experiencing some form of dislocation, such as a substantial decline in price or a spin off from a parent company. This helps us limit risk by reducing the value we are asked to pay for our part-ownership of a company.

Within that segment, we are likely to do more research on companies with one or more of the following characteristics:

- Have increasing insider ownership
- Are spinoffs
- Have high returns on invested capital
- Trading at a discount to their asset value

Assessment

We then qualitatively assess why this business has declined in price. Is this the peak of a cycle? Has a fundamental shift occurred in their business? This assessment can reduce the risk of investing in a company in the early phases of a long decline.

Best and Worst Case Financial Scenarios

If we think the company still has good long-term prospects in spite of a recent decline, we create a best and worst case company financial model and assign best and worst case valuations to our three-year-out forecast. This results in high and low future stock price targets. The worst case models force us to confront the bear case for a potential investment - compelling us to ask, "Is the risk worth the potential reward?"

If, in the final analysis, we can buy a high-return company with good prospects at a double-digit discount to the midpoint of the high and low price targets, then the stock is a buy. This process

enables us to buy what we believe are growth companies when they are priced at a value level. Simply put, we invest where we believe the best risk/reward can be found.

Global Growth Equity

The firm employs a research-intensive analytical process to uncover growth opportunities within the Global market, with an emphasis on investments in the United States and China.

INVESTMENT PHILOSOPHY:

- We seek to invest in companies that have attractive characteristics such as:
 - The potential to grow at above average rates by exploiting macroeconomic trends, including globalization, digitalization and youth demographics
 - The potential to capitalize on a disruptive technology
 - The possession of strategic advantages not fully recognized by the market
- We believe that China is a major source of disruptive change and that the emergence of the Chinese consumer will become the engine of global economic growth. In our opinion, information services that target the Chinese consumer are one of the best ways to exploit the trend.
- It is our belief that Internet adoption threatens legacy business model in developed economies by supplying transparency and global access to alternate suppliers.

The strategy has been managed since inception by Nels Wangenstein.

- We seek companies attacking large opportunities.
- We look for companies that apply information technology to huge addressable markets, such as travel or entertainment.
- We seek companies that have scalable solutions for growth.

We believe these companies have greater profit potential and the ability to reinvest their earnings back into research, marketing and development, accelerating their top-line growth.

- We seek companies with natural options for growth.

We look for companies that can easily extend their reach into adjacent areas (e.g., search engines move into advertising and international markets).

- We seek companies with management teams that can deliver results.

We actively look for management teams that are able to exploit their business' natural growth opportunities.

- We seek to keep abreast of developments by spending time with companies.

We regularly visit companies to meet in person with management, including traveling to China to meet with teams locally. We conduct our own qualitative research on companies

to determine whether they are desirable candidates for our portfolio, which includes attending conferences and meetings with key industry figures.

China Growth Equity

The firm employs a research-intensive analytical process to uncover growth opportunities within the Chinese market. The strategy will invest primarily in the Consumer sector in China using listed equity securities. The strategy has been managed since inception by Nels Wangenstein.

- We spend time meeting companies and key industry figures to determine whether a company qualifies for our portfolio
 - Travel in China to meet management and their competitors
 - Use face-to-face visits to assess a management team's ability to create and harness growth opportunities
 - Gather intelligence by using external research sources to substantiate in-house analysis
- We seek to identify companies with the foundation and capabilities necessary to achieve world-wide growth
 - Many of the types of businesses we've owned in the U.S. have counterparts in China that are in much earlier stages of growth
 - We hope to own businesses for a multi-year time frame
 - We constantly evaluate a company's risk/reward profile using intrinsic and relative valuation methods
 - We monitor competitive environment to anticipate threats or benefits to companies

Mullick Value Strategy

The Mullick Value Strategy aims to achieve a stable, long term solution to investors facing highly volatile global equity markets and treasuries with a negative real yield.

Mullick Value builds off a bottom-up stock selection process utilized by Basu Mullick in managing the Neuberger Berman Partners Fund, but with a greater emphasis on capital preservation and reduced volatility.

The Mullick Value Strategy approach:

- Value: We invest in out-of -favor large cap value stocks that generate free cash flow and have a strong balance sheet. We prefer companies that have strong returns and growing dividends.
- Margin of Safety: We believe that the combination of low valuation and margin of safety can position a portfolio for superior long term appreciation with relatively low volatility.
- Research: The market frequently misprices securities and misjudges future growth prospects. Value and potential for positive change can be ascertained by experienced investment professionals using fundamental bottom up research.

The strategy invests in 30-40 primarily large capitalization stocks.

Tailored Relationships

Our investment services will be customized for each client based on the client's current financial situation, financial goals, attitude towards risk and desired investment objectives and restrictions. In limited circumstances where the client is already invested in one of the strategies above, Integre may provide additional investment advice to clients (e.g. investment options in fixed income, mutual funds or ETF's). In such cases, Integre may charge a small fee for the additional individualized investment advice.

Integre is not engaged in any business activities other than investment management. It is registered with the SEC as an investment advisor, but holds no other registrations and has no arrangements with any client or related person that are material to its advisory business.

Wrap Fee Programs

Integre Wrap Fee Program

Integre also offers the Global Growth Equity and the China Growth Equity strategies as a wrap fee program ("Wrap Program") as described below. Integre offers the Wrap Program where it deems appropriate, to interested prospects and advisory clients. Integre is the sponsor of the Wrap Program and the party responsible for marketing it. Generally, the clients in the Wrap Program include high net worth individuals and trusts. Wrap accounts and non-wrap accounts are managed in the same way.

The description of the Wrap Program herein is a summary and a copy of the Integre wrap fee brochure (Form ADV Part 2A Appendix 1) is available to clients upon request without charge.

Clients may elect to pursue these strategies through the Wrap Program, under which clients will pay a single fee to Integre and Integre will then be responsible for all brokerage expenses (i.e., a wrap fee). By enrolling in the Wrap Program, clients are choosing the brokerage services of Schwab. Assets placed in the Wrap Program are managed on a fully discretionary basis by Integre. Investments may include common and preferred stocks, mutual fund, convertible bonds, non-convertible bonds and cash or cash equivalent holdings. Investments will not be made in futures or derivatives other than options on the instruments listed above.

Additional information about the Wrap Program, services, fees and conflicts are included in the Integre Asset Management, LLC Form ADV Part 2A Appendix 1 for this Wrap Program, which is provided to all Wrap Program clients.

RBC Wealth Management Wrap Fee Program

Managed Account Program (MAP)

Integre participates as a sub-adviser in the RBC Wealth Management Managed Account Program. RBC Wealth Management is a division of RBC Capital Markets, LLC, Member NYSE, FINRA and SIPC an unaffiliated registered broker-dealer. In this wrap fee advisory program a client's account is managed by one or more professional investment managers selected by a client in accordance with the client's risk profile. Additional information about the advisory services, brokerage, advisory fees, conflicts and other information is included in the RBC Wealth Management Form ADV Part 2A, Appendix # 1 (Wrap Fee Program Brochure) which is provided to all clients participating in the program. Integre is paid a portion of the wrap fee that RBC receives from its clients.

Review & Reports of Account

Integre's and RBC's Wrap Fee Program accounts will be formally reviewed at least each calendar quarter to determine that the account holdings are consistent with the investor profile, investment restrictions and risk objectives. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, the market, and political or economic environment. Program clients will receive account statements, at least quarterly, and transaction confirmations directly from their custodians. Integre may arrange for periodic performance reports to be delivered to the client or made available to the client in other electronic forms.

Assets under Discretionary and Non-Discretionary Management as of 12/31/2014

| | |
|-------------------|---------------|
| Discretionary | \$508,917,692 |
| Non-Discretionary | \$0 |
| Total Assets | \$508,917,692 |

Item 5: Fees and Compensation

Description

Integre serves as an investment advisor on a discretionary basis to individuals and institutions. For its separate account clients, Integre will develop a customized investment program for each client based on the client's goals, diversification requirements, risk tolerance, tax profile and other factors. The firm has a very limited number of legacy non-discretionary accounts.

Integre charges each client an advisory fee based on a percentage of assets under management. The advisory fee charged depends on (i) the client's investment objective and strategy (e.g., a total return strategy based primarily on common stocks or an income strategy based on bonds), (ii) the size of the account and (iii) other factors. The standard fee schedule is set forth below; fees are negotiable.

Fee Schedules

The fee schedule for our investment management services are set forth below. Fees are payable upon inception of the account and at the start of each calendar quarter thereafter. The market value

of each of the securities in the account shall be computed as of the close of trading on the last business day of March, June, September, and December. The advisory fee for the account for the following quarter shall be computed on the valuation as of the close of the previous quarter as follows.

For all Integre investment strategies the annual charge, payable quarterly in advance, is:

- A. For accounts with a market value of less than \$10 million:
 - 1.50% of the first \$2,500,000 of market value
 - 1.40% of the next \$2,500,000 of market value
 - 1.30% of the next \$2,500,000 of market value
 - 1.20% of the next \$2,499,999 of market value
- B. For accounts with a market value equal or greater than \$10 million:
 - 1.25% of the first \$10,000,000 of market value
 - 0.90% of the remaining balance of market value
- C. For the China Growth Equity Strategy
 - 1.50% on all assets
- D. For the Integre Wrap Program¹
 - 1.50% of the first \$2,500,000 of market value
 - 1.40% of the next \$2,500,000 of market value
 - 1.30% of the next \$2,500,000 of market value
 - 1.20% of the next \$2,499,999 of market value
- E. For the RBC Wrap Fee Program
 - Advisory and sub-advisory fees are disclosed with other wrap fee disclosures in the RBC Wrap Fee Brochure (Form ADV 2 Appendix #1) provided to clients in this program.
- F. The total amount paid using this schedule may be more or less than the amount charged by Integre under other fee schedules offered to other clients.
- G. Fees are subject to negotiation in certain cases.

Account Minimums

Integre prefers a minimum portfolio of \$1 million for our equity investment strategies, which may be waived depending on various circumstances.

Our Wrap Program services are offered and designed for smaller portfolios, typically under \$250,000.

¹ The Integre Wrap Program is only available to certain legacy clients.

Legacy Fees

With respect to certain older or "legacy" clients, a different fee schedule than the one set forth above may be in place. For legacy clients, the typical advisory fee for an equity account is 1% of assets under management on an annual basis and the typical advisory fee for a fixed income account is .375% of assets under management on an annual basis. In addition, certain legacy clients may be charged a performance fee on the equity portion of their account.

Certain other legacy clients have arrangements where they are charged a 1.5% annual management fee but no performance fee.

Performance Fees

Performance fees may be offered by Integre for qualified and eligible clients. Any performance fees will be imposed in accordance with Rule 205-3 under the Investment Advisers Act of 1940. Performance fees are typically 20% of the return on the equity portion of the account in excess of a benchmark return, typically the S&P 500 Total Return Index. Accounts also have a high water mark, such that a performance fee will be assessed only if the account both outperforms the benchmark and has made cumulative profits in excess of any losses. A performance-based fee may give Integre the incentive to manage an account in a more aggressive manner than would otherwise be the case. Because Integre's compensation is based in part on capital appreciation, there may be an incentive for it to make investments that are riskier or more speculative than would be the case in the absence of such a performance fee. Integre will receive compensation based on unrealized appreciation as well as realized gains in assets of a performance-based fee account.

Fee Billing

Advisory fees are generally assessed quarterly in advance.

For certain clients that maintain custodian brokerage accounts, Integre with the written consent of clients, provides such clients and custodian with an invoice for payment of such advisory fee. Each client invoice describes the amount of the advisory fee, the value of the client's assets on which the fee was based and the manner in which the fee was calculated. Unless the client directs otherwise, the custodian directly deducts the advisory fee from the clients' account and remits such amount directly to Integre. At least on a quarterly basis, the custodian sends each client a statement summarizing all amounts disbursed from such client's account during such period, including the amount of such client's advisory fees, if any, paid directly to Integre by the custodian.

For other client relationships, Integre invoices the client directly for advisory fees, and the clients pay Integre directly without directly debiting the fees from the client's custodial account.

Performance fees may be assessed and paid at the end of each annual period, upon termination of the account and upon a withdrawal of assets.

A client may terminate its investment management agreement at any time on written notice. If funds are contributed during the quarter a pro-rated advisory fee will be charged on such assets based on the number of days such funds were managed by Integre during such quarter. If funds are withdrawn during a quarter a pro rata portion of the advisory fee will be refunded based on the number of days such assets were in the client account during the quarter.

Other Fees or Expenses

In considering Integre, a prospective client should be aware that the client's investment portfolio will have costs outside of investment management fees. Brokerage commissions and possible custodian fees are charged separately (see Item 12 for more information). The fees charged by Integre are separate and distinct from the fees charged by recommended mutual funds, ETFs, brokers and custodians. A description of these mutual fund or ETF fees is available in each mutual fund's or ETF's prospectus. The factors that should be considered by a prospective client in analyzing the cost structure of a client's portfolio, the nature of the investments to be managed, average commission costs, custodial expenses, if any, the anticipated level of trading activity and the amount of advisory fees and commissions that would be charged.

Part 6: Performance Based Fees and Side-by-Side Management

Integre may, as a matter of policy, offer and charge performance-based fees for its investment management services when appropriate and agreed upon with qualified clients. Currently, our firm only has certain legacy relationships with such fee arrangements.

Side-by-side management refers to multiple client relationships where an adviser manages advisory client relationships and portfolios on a simultaneous basis for individuals, businesses, institutions. In such circumstances, potential conflicts of interest may arise by and between the client accounts that pay only management fees and the client accounts that pay both management fees and performance fees.

Integre does not currently manage any hedge funds or mutual funds or have any performance based fee arrangements, except for certain legacy clients. Accordingly, Integre only has side-by-side potential or actual conflicts of interests to the extent of the certain legacy performance fee relationships and also to the extent that investment opportunities may be available and allocated among our clients. Integre, as a fiduciary to our clients, has adopted allocation policies for the fair and equitable treatment of all clients as more fully described in Item 12 below.

In order to minimize any conflicts of interest, Integre combines both management fee accounts and performance fee accounts in the investment product strategy. All trades are done on the strategy level and are allocated independently of the portfolio manager through use of an order management system. Item 12, below, addresses more specifically the allocation procedures for full and partially completed orders.

Part 7: Types of Clients

The minimum amount to open an account is \$1,000,000, which minimum may be waived. Our Wrap Fee Program services are offered for smaller portfolios, typically under \$250,000.

Integre provides advisory services to:

- High net worth individuals*
- Pension and profit sharing plans
- Corporations
- Foundations and charitable organizations

*Individuals include trusts, estates, family offices, and IRA's

Part 8: Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies

Integre's investment objective is to seek consistent superior returns primarily through long-term capital appreciation, while also attempting to preserve capital and mitigate risk through diversification of investments, proper position sizing and limiting exposure to less liquid investments. Integre anticipates that client assets will be invested in publicly traded equity securities. The focus will be on purchasing securities which it believes, based on fundamental research, to be available for purchase at a considerable discount to the intrinsic value of the underlying assets or business. Integre has strategies that will invest in companies of any market capitalization, geographic location or market sector.

Risk of Loss

No assurance can be given, however, that Integre will achieve its objective, and investment results may vary substantially over time and from period to period. Investing in securities involves risk of loss that the clients must be prepared to bear, including the loss of principal. Integre makes no representations or warranties of any kind nor are any intended or should be inferred with respect to the economic return from, or the tax consequences of, a prospective investment.

Listed below are additional or further explanations of material risks involved in connection with our investment strategy:

Stock Portfolios. Client accounts will be subject to the risks associated with any equity investment strategy. Sharp downward market moves will adversely impact account positions and result in client account losses. Losses may also be incurred on individual positions as a result of issuer-specific matters such as unexpectedly disappointing earnings, lawsuits, patent issues, analyst action or other matters. Equity returns are volatile and may fluctuate substantially over time.

Investing in Fixed Income Securities. Issuers of fixed income securities have a contractual obligation to pay interest at a specified rate (coupon rate) on specified dates and to repay principal (face value or par value) on a specified maturity date. Certain bonds (usually intermediate and long-term bonds) have provisions that allow the issuer to redeem or "call" a bond before its maturity. Issuers are most likely to call such bonds during periods of falling interest rates. As a result, client accounts may be required to invest the unanticipated proceeds of a called security at lower interest rates, which may cause such client accounts' income to decline.

In addition, the value of an individual security or particular type of security can be more volatile than the market as a whole and can perform differently from the value of the market as a whole. Lower-quality debt securities (those of less than investment-grade) involve greater risk of default on interest and principal payments or price changes due to changes in the credit quality of the issuer. The value of lower-quality debt securities can be more volatile due to increased sensitivity to adverse issuer, political, regulatory, market or economic developments.

Small Cap Issuers. At any given time, Integre has strategies that may invest client accounts in smaller-to-medium sized companies of a less seasoned nature. Securities of such issuers often involve significantly greater risks than the securities of larger, better-known companies.

Information Sources and Analysis. Integre selects investments based in part on information and data that the issuers of securities file with various government agencies or make directly available to Integre or that it obtains from other sources. Integre is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information may not be readily available.

Integre is not in a position to obtain all relevant information regarding a company or a security. Further, Integre may misinterpret or incorrectly analyze the information that it has about a particular fund, company or security. These and other factors may cause Integre to (a) invest in securities at times that will lead to losses in client accounts and may cause a client to lose a significant portion of its investment or (b) refrain from investing in particular securities at times that would have resulted in gains in the client's portfolio if Integre would have caused the client's account to invest.

Foreign & Emerging Markets. Some of the countries in which Integre will invest have experienced political, economic and/or social instability. Many emerging market countries have also experienced dramatic swings in the value of their national currency. There can be no assurance given that such instability or such fluctuations will not occur in the future and, if they do occur, that they will not have a material adverse effect on the performance of client accounts. The laws and regulations in some of the countries in which Integre invests are subject to frequent changes driven by economic, social and political instability. The legal systems in certain countries may be transitional and the laws regulating securities transactions protection of investors and ensuring market discipline, which are customary in countries with developed securities markets, are not available. In countries where legal and regulatory frameworks are in place, the enforcement of laws and regulations may be inadequate or insufficient.

Some of the countries where Integre invests may not recognize regulation by the exchanges and self-regulatory organizations as law that can be enforced through the judiciary or by means otherwise available to the investors in developed markets.

Derivatives regulation and trading has not been developed in some of the countries where Integre will invest. The investments made by Integre may not be recognized as securities protected by the securities laws in the countries where the investments are made. Investments that are recognized as securities under the local laws are often traded on the foreign exchanges with very little liquidity, thus adversely affecting the ability of the securities holders to liquidate their investment holdings.

Some of the countries where Integre invests currently have or may in the future introduce foreign exchange control regulations which can limit the ability of Integre to repatriate the dividends, interest or other income from the investments or the proceeds from sale of securities.

Risks associated with the investments in the emerging markets, including but not limited to the risks described above, could adversely affect the performance of client accounts and result in substantial losses. No assurance can be given as to the ability of Integre to achieve any return on its investments and, in turn, return on client accounts.

Part 9: Disciplinary Information

Integre employees or members do not have any legal or disciplinary events to report.

Part 10: Other Financial Industry Activities and Affiliations

Related Person Arrangements

Neither Integre nor any of its management persons have any relationship or arrangement that is material to its advisory business or to its clients, and they devote substantially all their time and efforts to Integre's advisory services and our clients.

Sourabh Banerji, a Senior Vice President at Integre, serves as a Director on the board of Gaja Capital Advisors, Pvt. Ltd, a Mauritius based private equity firm with a primary focus on private equity investments in India. Since Integre does not invest in or recommend private equity investments in India, Integre does not believe Mr. Banerji's board involvement presents any actual or potential conflict of interest except to the extent that the board activity occupies a small portion of Mr. Banerji's time.

Arrangements with Other Investment Advisers

Integre does not recommend or select other investment advisers for our clients nor does Integre have other business relationships with those advisers that create a material conflict of interest.

Part 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Integre has adopted a Code of Ethics (the “Code of Ethics”) in accordance with Rule 204A-1 of the Investment Advisers Act of 1940 (the “Act”). A copy of the Code of Ethics is available to clients without charge upon written request to Francois Coeytaux, Chief Operating Officer and Chief Compliance Officer. The purpose of the Code of Ethics is to set forth certain key guidelines that have been adopted by us as firm policy for the guidance of all personnel and to specify the responsibility of all employees of and consultants to Integre to act in accordance with their fiduciary duty to our clients and to comply with applicable federal and state laws and regulations.

The Code of Ethics requires that all employees and consultants conduct themselves in accordance with high ethical standards, which should be premised on the concepts of integrity, honesty and trust, and in full compliance with all applicable federal and state laws and regulations concerning the securities industry.

The following is a summary of certain provisions of the Code of Ethics:

Confidential Information. As an investment adviser, we have a fiduciary duty to our clients not to divulge or misuse information obtained in connection with our services as an adviser. Therefore, all information, whether of a personal or business nature, that an employee or consultant obtains about a client's affairs in the course of employment or in connection with a consulting agreement with us should be treated as confidential and used only to provide services to or otherwise to the benefit of the client. Such information may sometimes include information about non-clients, and that information should likewise be held in confidence. Even the fact that Integre advises a particular client should ordinarily be treated as confidential.

Material Inside Information. All partners, employees and consultants of Integre (in any capacity) and all persons - friends, relatives, business associates and others - who receive nonpublic material inside information from employees concerning an issuer of securities (whether such issuer is a client or not) are subject to these rules. The Code of Ethics sets forth definitions and categories of information about which is likely to be material inside information. The Code of Ethics forbids trading on or misusing material inside information and also explicitly forbids disclosing material inside information to another person (“tipping”) who subsequently uses that information for his or her profit.

Fiduciary Duty and Conflicts of Interest. Integre and its employees and partners have a fiduciary duty to our clients to act for the benefit of the clients before taking any action in interest of any employee or the firm.

The Code of Ethics also addresses, among others, the following common examples of conflicts of interest.

Gifts and Entertainment. In order to address conflicts of interest that may arise when an employee accepts or gives a gift, favor, entertainment, special accommodation, or other items of value, Integre places restrictions on gifts and entertainment. The Code of Ethics contains policies relating to gifts and entertainment.

Scalping or Front-Running. The Code of Ethics contains policies relating to scalping or front-running trades for clients.

Participation or Interest in Client Transactions and Personal Trading

Personal Trading. No employee or principal may buy, sell, or pledge any security (other than U.S. government bonds, ETFs, index options, money market funds and open-end mutual funds) for any personal account (which includes accounts for certain family members as described in the Code of Ethics) without obtaining written clearance from the Chief Compliance Officer *before* effecting any such transaction, specifying the securities involved, dated, and signed by the Chief Compliance Officer. In addition, no preclearance is required for personal and related account transactions as part of trades in the same security alongside advisory client transactions in an Integre product strategy. It is each employee's responsibility to bring proposed transactions to the Chief Compliance Officer's attention and to obtain from the Chief Compliance Officer follow-up written documentation of any oral clearance. Transactions effected without preclearance are subject, in the Chief Compliance Officer's discretion (after consultation with other members of management, if appropriate), to being reversed or, if the employee made profits on the transaction, to disgorgement of such profits. Additionally, any trades made by the Chief Compliance Officer shall be approved by the President, or in his absence, the highest ranking employee present at the time of the trade.

In accordance with the Code of Ethics, employees are required to file initial / annual holdings and quarterly transaction reports, and annual attestations, with the Chief Compliance Officer.

Participation or Interest in Client Transactions. Generally, the Chief Compliance Officer may allow an employee or principal to buy or sell a security at or about the same time we are buying or selling this security on behalf of clients in an Integre investment strategy security only if the employee or principal account is fully invested in the same investment strategy. Also, the Chief Compliance Officer may allow an employee or principal to invest in the same or a different security that a client may invest in, or buy or sell a security for a client that an Integre employee or principal may have a material financial interest in.

Part 12: Brokerage Practices

Participation or Interest in Client Transaction

Neither Integre nor any related persons engage in the purchase or sale of securities to or from client accounts (principal transactions), nor do they act as agent or broker for any other person in transactions in which client securities are bought or sold (agency cross transactions).

Selecting Brokerage Firms

Integre will enter into an agreement with each client under which it will have the discretion, absent specific instructions from the client, to make all investment and brokerage decisions for the client.

Integre may recommend Charles Schwab, an independent registered broker-dealer and qualified custodian, whereby Charles Schwab may provide certain brokerage and custodial services to the clients of Integre. Integre typically recommends Charles Schwab to clients without an existing brokerage arrangement.

Integre also has arrangements with Deutsche Bank and RBC whereby it has agreed to provide portfolio management services as a sub-adviser to certain clients of those firms.

As noted above, Integre generally has the authority to determine the broker-dealer to be used in any securities transaction and the commission rate to be paid. While the primary criterion for all transactions in portfolio securities is the execution of orders at the most favorable net price, numerous additional factors are considered by Integre when arranging for the purchase and sale of clients' portfolio securities. These include restrictions imposed by the federal securities laws and the allocation of brokerage in return for certain services and materials described below. In determining the abilities of the broker-dealer to obtain best execution of a particular transaction, Integre will consider all relevant factors including the execution capabilities required by the transaction(s), the ability and willingness of the broker-dealer to facilitate the account's portfolio transactions promptly and at reasonable expense, the importance to the account for speed, efficiency or confidentiality and the broker-dealer's apparent familiarity with sources from or to whom particular securities might be purchased or sold, as well as any other matters Integre deems relevant to the selection of a broker-dealer for a particular portfolio transaction of the account.

The majority of Integre's trades is done on an agency basis and may involve a market-maker. Thus, clients pay a commission to the broker for effecting the trade and also pay the market makers the offering or bid prices of the securities purchased or sold. In addition, certain of the broker-dealers may also charge a minimum ticket charge ranging from \$10 to \$25 depending on the firm and the size of the transaction. Minimum ticket charges may be in place of a commission or in addition to a cents per share commission.

Research and Other Soft Dollar Benefits

When the "best execution" criteria are satisfied, those broker-dealers who supplement Integre's capabilities with research, quotation and certain software materials may be selected by Integre to

provide brokerage services. Ongoing research and live data feeds are critical elements of Integre's investment management process. Accordingly, Integre may use broker provided research and brokerage related products and services which assist Integre in carrying out its investment decision making responsibilities. These services may include, but are not limited to, research, data feeds and analytical software, such as Bloomberg, Thomson and IDC market data. Integre adheres to Section 28(e) of the Securities Exchange Act of 1934, as amended, in connection with its use of soft dollars. Integre benefits from the use of soft dollars because it does not have to pay for or otherwise produce the items obtained through soft dollars itself. This may create an incentive for Integre to pick brokers that offer soft dollar arrangements, rather than picking brokers based on best execution. However, the amount of soft dollar benefits received by Integre is not viewed as material by Integre, and accordingly Integre does not believe it influences our brokerage decisions in practice.

In some cases Integre acquires a research product or service with soft dollars which also has non research uses. In these cases Integre makes a reasonable allocation of the cost of the product or service according to its use. That portion of the product or service which provides administrative or other non-research services is paid for by Integre in hard dollars.

All research or other services received from broker-dealers to whom commissions are paid are used collectively. There is no direct relationship between commissions received by a broker-dealer from a particular client's transactions and the use of any or all of that broker-dealer's research material in relation to that client's account. Integre may pay a broker-dealer a brokerage commission in excess of that which another broker-dealer might have charged for the same transaction in recognition of research and brokerage related services provided by the broker-dealer. Integre would be pleased to provide additional detail to clients about its soft dollar practices upon request.

Brokerage for Client Referrals

Integre does not participate in brokerage for client referral programs.

Directed Brokerage

In certain instances, advisory clients may already have a relationship with an existing broker-dealer or request that Integre place the client's orders with a particular brokerage firm pursuant to directions received from the client ("broker-dealer directed accounts"). In broker-dealer directed accounts, it is the responsibility of the client, not Integre, to negotiate the commission rates, and clients should recognize that they may pay a higher brokerage commission or receive less favorable execution than might otherwise be possible. Clients should also be aware of our firm's lack of authority to negotiate commissions and obtain volume discounts, and that best execution may not be achieved for broker-dealer directed accounts.

Clients should also be aware that disparities in commission charges may exist between the commissions charged to other clients for similar trades. Additionally, directed brokerage accounts may be traded after discretionary accounts.

Aggregation of Client Accounts

Allocation Procedures

A. Preparation of Allocation Statement

Prior to entering an order, the portfolio manager will prepare a statement in written or electronic form such as the trade blotter or order management system (the “Allocation Statement”) specifying participating accounts and the allocation of the order among such accounts.

B. Order Rotation

Our firm has adopted trade rotation procedures which randomize the order entry processes among our investment strategies and directed brokerage arrangements so no particular client(s) or group(s) are favored or disfavored by having their orders placed first or last in the rotation.

C. Pro-Rata vs. Random Allocation in the Context of Aggregated Trades

Integre may manage a number of portfolios and expects that the various portfolios it manages will, from time to time, purchase or sell the same securities. Integre may aggregate orders for the purchase or sale of securities on behalf of a portfolio with orders on behalf of other portfolios it manages. If an aggregated order is filled in its entirety, it will be allocated among participating accounts in accordance with the Allocation Statement. If an aggregated order is partially unexecuted at the end of a trading day, then in general, Integre allocates trades on a pro-rata basis among the participating portfolios in proportion to their planned participation in the aggregated orders. However, Integre may invest in limited availability or thinly traded securities in which it may be unable to acquire the full desired position. Because block orders for such securities are rarely completed in a single trade, and to avoid allocating tiny blocks of such securities, which may increase settlement and transaction costs, Integre may elect to allocate shares using a random allocation method based on the random allocation program of Moxy, the order management system provided by Advent, an unaffiliated service provider. In situations where the random allocation method is used by Integre, Moxy will randomly fill the total amount for a client before randomly selecting the next client. On its own, the random allocation method would usually result in a partial fill for the last account selected. Random allocation should ensure that over time all eligible accounts have an opportunity to participate in such transactions. Integre believes that random allocation is especially appropriate when the transaction size is too limited to be efficiently allocated pro rata among all eligible managed accounts.

D. When Full Aggregation is not Possible

In some circumstances, it may be appropriate to buy or sell a security on behalf of more than one advisory client account over a period of time. In those instances, although it may not be possible for aggregated orders to be entered for all of Integre’s clients, the portfolio manager still must allocate advisory clients’ orders on an equitable basis as described in the above section.

Part 13: Review of Accounts

Periodic Reviews

Integre monitors portfolio securities and financial markets on an on-going basis and client records are updated on a daily basis and available for review daily. Such monitoring includes formal review of client accounts by the Portfolio Managers at least quarterly. Operations and accounting reconcile accounts daily.

Review Triggers

Accounts are formally reviewed quarterly by Integre management, unless the client or Integre believes an interim review is warranted. Such interim review might occur as the result of a change in the investment goals or financial condition of a client or upon a client's request.

Regular Reports

Clients receive a confirmation for each transaction effected for their accounts and monthly statements reflecting all account activity directly from their broker/custodian. Additionally, Integre issues quarterly appraisal and performance reports for each account. Performance reports reflect the realized and unrealized gains and losses in an account, provide a summary of activity in the account in the quarter, and compare the performance of the account to various indices.

Part 14: Client Referrals and Other Compensation

Integre may from time to time, either directly or indirectly, compensate persons (defined as a natural person or a company) for client referrals. For client referral arrangements, our firm will typically pay a percentage of the annual advisory fees earned for any clients referred to Integre to those persons referring clients to the firm. For certain arrangements, a client's advisory fees will be increased as a result of the referral arrangements because the referral fees, in addition to Integre's advisory fees, are paid by the client.

Integre is aware of the special considerations under Rule 206(4)-3 under the Advisers Act. Accordingly, appropriate disclosures will be made and records maintained by our firm consistent with applicable regulatory requirements

Integre does not have any arrangements under which it receives any economic benefit or compensation, including sales awards or prizes for any client referrals.

Part 15: Custody

Integre is deemed to have custody under regulatory guidelines as a result of Integre's authority from certain clients for our firm to directly debit client advisory fees from their custodian accounts consistent with industry practices and regulatory guidelines.

All assets are held in the client's name and not in Integre's name at the custodian. Integre may recommend Charles Schwab as the primary custodian for the client. However, the client may choose any custodian that provides security clearing services. Clients will receive monthly statements from Charles Schwab, or the custodian that the client chose, and clients should carefully review those statements.

Clients will receive monthly/quarterly statements from Integre and are urged to carefully review each statement. In order to ensure that all account transactions, holdings and values are correct and current, we urge clients to compare our firm's statements with the statements you receive directly from your independent brokerage or bank qualified custodian.

Part 16: Investment Discretion

Integre has investment discretionary authority over the purchase and sale decisions for certain clients. Such discretionary authority is conveyed through management agreements with clients. Under certain circumstances, clients maintain investment authority over their accounts and Integre does not have discretionary authority. For example, this could occur where Integre is providing investment advice to an estate while it's being settled. Integre does not charge fees on certain legacy positions in Client accounts, over which Integre does not have discretion and for which Integre does not provide investment advice.

Part 17: Voting Client Securities

Proxy Voting

Integre has adopted policies and procedures with respect to the voting of proxies relating to securities held in client accounts. When a client has delegated responsibility for voting proxies to Integre, we evaluate and vote the proxies in a manner consistent with the client's best interests. Prior to a proxy voting deadline, Integre evaluates the issues presented. Typically, Integre votes in accordance with the recommendations of company management, since the quality of company management is one of the criteria on which we rely in connection with making our investment decisions. However, Integre will vote against recommendations of management if we determine that such a vote is not in the best interests of our clients. Further, there may be times when Integre determines that refraining from voting a proxy is in clients' best interests, such as when the cost of voting a proxy exceeds the expected benefit to clients. Clients have the right to direct Integre how to vote on a particular matter.

In the event Integre determines that a material conflict of interest exists with respect to a proposal being voted on, Integre will engage a reputable non-interested party to independently review Integre's vote and to confirm that Integre's vote recommendation is in the best interests of its clients under the circumstances. If the independent third party determines that Integre's vote recommendation is not in the best interests of its clients under the circumstances, then Integre shall vote in the manner suggested by such independent third party.

Clients may obtain information regarding how Integre voted their securities, or request a copy of the firm's proxy voting policies and procedures, by contacting Francois Coeytaux, (Chief Operating Officer and Chief Compliance Officer) in writing at Integre Asset Management, 767 Fifth Avenue, 15th Floor, New York, New York 10153 or emailing him at fcoeytaux@integreAM.com.

Integre may receive notices in relation to class actions involving securities in which Clients are invested. Integre will determine whether to return any documentation inadvertently received regarding Clients' participation in class actions to the sender, or to forward such information to the appropriate Clients. Where the securities are those on which Integre is advising, it will assist clients in filing appropriate notices for participation and recovery.

Item 18: Financial Information

As a matter of firm policy and practice, our firm will not charge or earn advisory fees in excess of \$1,200 more than six months in advance of the services rendered.

Also, our firm and its principals have no financial events or proceedings to disclose.

FORM ADV 2B

Part 2B of Form ADV: *Brochure Supplement*

Emanuel Weintraub
Owner and Principal
Integre Asset Management, LLC
767 Fifth Avenue, 15th Floor
New York, NY 10153
(212) 838-2300

March 2015

This brochure supplement provides information about Emanuel Weintraub that supplements the Integre Asset Management, LLC. Firm Brochure. You should have received a copy of that brochure. Please contact Francois Coeytaux, Chief Operating Officer, (212-838-2300) if you did not receive Integre Asset Management, LLC.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Emanuel Weintraub is available of the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Emanuel Weintraub, Owner and Principal

Year of Birth: 1965

Education:

Mr. Weintraub graduated from the University of Pennsylvania in 1987 with a Bachelor of Arts in Anthropology.

Professional Designations:

Chartered Financial Analyst (CFA) 1993²

Business Background:

Owner and Principal, Integre Asset Management, LLC, 11/2003 to present
Chief Compliance Officer, Integre Asset Management, LLC, 11/2003 to 08/2005
Portfolio Manager, Neuberger Berman, 06/1998 to 11/2003

Item 3. Disciplinary Information

Mr. Weintraub does not have any history of any disciplinary or regulatory events to disclose.

Item 4. Other Business Activities

Mr. Weintraub does not engage in any other business or occupation.

Item 5. Additional Compensation

Mr. Weintraub does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate or receive any compensation from anyone for client referrals.

Integre Asset Management does have several arrangements under which the firm compensates another for client referrals. The compensation is typically a percentage of the advisory fees earned by our firm.

² **Chartered Financial Analyst (CFA)[®]**

This designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA charter, candidates must successfully complete three difficult exams and gain at least three (3) years of qualifying work experience, among other requirements. In passing these exams, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

Item 6. Supervision***Investment Reviews***

The accounts are under ongoing supervision by Emanuel Weintraub and are also reviewed regularly by other members of the firm's investment team. Investment recommendations are also made on an ongoing basis. The firm recommends meeting with clients at least annually, and, in some cases, more often, to review the investment outlook, investment goals and objectives, investment policies and strategies, procedures, and the portfolio positions and performance. Client portfolios also receive a more formal review on a periodic basis by Emanuel Weintraub. More frequent reviews may be triggered by changes in market, political or economic conditions, or a client's request.

Supervisory Reviews

Mr. Weintraub, as a Principal of Integre, has the overall responsibility for the management of the firm, including the supervision of the investment professionals, and setting business strategies and initiatives, among other things and may be contacted at 212-838-2300 and by email at mweintraub@integreAM.com.

All directors, principals, portfolio managers, traders and analysts of Integre report directly or indirectly to Emanuel Weintraub.

Any clients with questions about the handling of their investments should contact the portfolio manager. All complaints should be sent to Francois Coeytaux, Chief Operating Officer.

FORM ADV 2B

Part 2B of Form ADV: *Brochure Supplement*

Sourabh Banerji
Senior Vice President
Integre Asset Management, LLC
767 Fifth Avenue, 15th Floor
New York, NY 10153
(212) 838-2300

March 2015

This brochure supplement provides information about Sourabh Banerji that supplements the Integre Asset Management, LLC. Firm Brochure. You should have received a copy of that brochure. Please contact Francois Coeytaux, Chief Operating Officer, (212-838-2300) if you did not receive Integre Asset Management, LLC.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Sourabh Banerji is available of the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Sourabh Banerji, Senior Vice President

Year of Birth: 1969

Education:

Mr. Banerji graduated from Columbia University School of Business in 2003 with a Master of Business Administration in Finance.

Mr. Banerji graduated from Indian Institute of Technology, India, in 1992 with a Bachelor of Science in Engineering.

Professional Designations:

None

Business Background:

Senior Vice President, Integre Asset Management, LLC, 02/2004 to Present

Vice President of the Portfolio Analyst and Construction Group, Goldman Sachs, 10/1999 to 02/2004

Item 3. Disciplinary Information

Mr. Banerji does not have any history of any disciplinary or regulatory events to disclose.

Item 4. Other Business Activities

Mr. Banerji serves as a Director on the board of Gaja Capital Advisors, Pvt. Ltd, a Mauritius based private equity firm with a primary focus on India and private equity investments in that country. Integre does not invest in or recommend private equity investments in India so this does not present any actual or potential conflict of interest except to the extent Mr. Banerji devotes a very small portion of his time to this outside Board activity. In addition, he does receive separate and customary compensation for his role on the Board of Directors of this outside firm.

Item 5. Additional Compensation

Mr. Banerji does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate or receive any compensation from anyone for client referrals.

Integre Asset Management does have several arrangements under which the firm compensates another for client referrals. The compensation is typically a percentage of the advisory fees earned by our firm.

Item 6. Supervision***Investment Reviews***

The accounts are under ongoing supervision by Emanuel Weintraub and are also reviewed regularly by other members of the firm's investment team. Investment recommendations are also made on an ongoing basis. The firm recommends meeting with clients at least annually, and, in some cases, more often, to review the investment outlook, investment goals and objectives, investment policies and strategies, procedures, and the portfolio positions and performance. Client portfolios also receive a more formal review on a periodic basis by Emanuel Weintraub. More frequent reviews may be triggered by changes in market, political or economic conditions, or a client's request.

Supervisory Reviews

Mr. Weintraub, as a Principal of Integre, has the overall responsibility for the management of the firm, including the supervision of the investment professionals, and setting business strategies and initiatives, among other things and may be contacted at 212-838-2300 and by email at mweintraub@integreAM.com.

All directors, principals, portfolio managers, traders and analysts of Integre report directly or indirectly to Emanuel Weintraub.

Any clients with questions about the handling of their investments should contact the portfolio manager. All complaints should be sent to Francois Coeytaux, Chief Operating Officer.

FORM ADV 2B

Part 2B of Form ADV: *Brochure Supplement*

Dan McCarthy
Principal, Portfolio Manager
Integre Asset Management, LLC
767 Fifth Avenue, 15th Floor
New York, NY 10153
(212) 838-2300

March 2015

This brochure supplement provides information about Dan McCarthy that supplements the Integre Asset Management, LLC. Firm Brochure. You should have received a copy of that brochure. Please contact Francois Coeytaux, Chief Operating Officer, (212-838-2300) if you did not receive Integre Asset Management, LLC.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Dan McCarthy is available of the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Dan McCarthy, Principal, Portfolio Manager

Year of Birth: 1938

Education:

Mr. McCarthy graduated from Cornell University in 1965 with a Master of Business Administration degree.

Mr. McCarthy graduated from Cornell University in 1961 with a Bachelor of Arts degree.

Professional Designations:

None

Business Background:

Principal, Portfolio Manager, Integre Asset Management, LLC, 05/2008 to Present
Portfolio Manager, Neuberger Berman, 07/1999 to 05/2008

Item 3. Disciplinary Information

Mr. McCarthy does not have any history of any disciplinary or regulatory events to disclose.

Item 4. Other Business Activities

Mr. McCarthy does not engage in any other business or occupation.

Item 5. Additional Compensation

Mr. McCarthy does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate or receive any compensation from anyone for client referrals.

Integre Asset Management does have several arrangements under which the firm compensates another for client referrals. The compensation is typically a percentage of the advisory fees earned by our firm.

Item 6. Supervision***Investment Reviews***

The accounts are under ongoing supervision by Dan McCarthy and are also reviewed regularly by other members of the firm's investment team. Investment recommendations are also made on an ongoing basis. The firm recommends meeting with clients at least annually, and, in some cases, more

often, to review the investment outlook, investment goals and objectives, investment policies and strategies, procedures, and the portfolio positions and performance.

Client portfolios also receive a more formal review on a periodic basis by Dan McCarthy. More frequent reviews may be triggered by changes in market, political or economic conditions, or a client's request.

Supervisory Reviews

Mr. Weintraub, as a Principal of Integre, has the overall responsibility for the management of the firm, including the supervision of the investment professionals, and setting business strategies and initiatives, among other things and may be contacted at 212-838-2300 and by email at mweintraub@integreAM.com.

All directors, principals, portfolio managers, traders and analysts of Integre report directly or indirectly to Emanuel Weintraub.

Any clients with questions about the handling of their investments should contact the portfolio manager. All complaints should be sent to Francois Coeytaux, Chief Operating Officer.

FORM ADV 2B

Part 2B of Form ADV: *Brochure Supplement*

Nels Wangenstein
Principal, Portfolio Manager
Integre Asset Management, LLC
767 Fifth Avenue, 15th Floor
New York, NY 10153
(212) 838-2300

March 2015

This brochure supplement provides information about Nels Wangenstein that supplements the Integre Asset Management, LLC. Firm Brochure. You should have received a copy of that brochure. Please contact Francois Coeytaux, Chief Operating Officer, (212-838-2300) if you did not receive Integre Asset Management, LLC.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Nels Wangenstein is available of the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Nels Wangenstein, Principal, Portfolio Manager

Year of Birth: 1963

Education:

Mr. Wangenstein graduated from New York University in 1989 with a Master of Business Administration degree.

Mr. Wangenstein graduated from Colgate University in 1986 with a Bachelor of Arts degree.

Professional Designations:

None

Business Background:

Principal, Portfolio Manager, Integre Asset Management, LLC, 04/2008 to Present
Portfolio Manager, Neuberger Berman, 07/1999 to 04/2008

Item 3. Disciplinary Information

Mr. Wangenstein does not have any history of any disciplinary or regulatory events to disclose.

Item 4. Other Business Activities

Mr. Wangenstein does not engage in any other business or occupation.

Item 5. Additional Compensation

Mr. Wangenstein does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate or receive any compensation from anyone for client referrals.

Integre Asset Management does have several arrangements under which the firm compensates another for client referrals. The compensation is typically a percentage of the advisory fees earned by our firm.

Item 6. Supervision***Investment Reviews***

The accounts are under ongoing supervision by Nels Wangenstein and are also reviewed regularly by other members of the firm's investment team. Investment recommendations are also made on an ongoing basis. The firm recommends meeting with clients at least annually, and, in some cases, more often, to review the investment outlook, investment goals and objectives, investment policies and strategies, procedures, and the portfolio positions and performance. Client portfolios also receive a

more formal review on a periodic basis by Nels Wangenstein. More frequent reviews may be triggered by changes in market, political or economic conditions, or a client's request.

Supervisory Reviews

Mr. Weintraub, as a Principal of Integre, has the overall responsibility for the management of the firm, including the supervision of the investment professionals, and setting business strategies and initiatives, among other things and may be contacted at 212-838-2300 and by email at mweintraub@integreAM.com.

All directors, principals, portfolio managers, traders and analysts of Integre report directly or indirectly to Emanuel Weintraub.

Any clients with questions about the handling of their investments should contact the portfolio manager. All complaints should be sent to Francois Coeytaux, Chief Operating Officer.

FORM ADV 2B

Part 2B of Form ADV: *Brochure Supplement*

S. Basu Mullick
Principal, Portfolio Manager
Integre Asset Management, LLC
767 Fifth Avenue, 15th Floor
New York, NY 10153
(212) 838-2300

March 2015

This brochure supplement provides information about S. Basu Mullick that supplements the Integre Asset Management, LLC. Firm Brochure. You should have received a copy of that brochure. Please contact Francois Coeytaux, Chief Operating Officer, (212-838-2300) if you did not receive Integre Asset Management, LLC.'s brochure or if you have any questions about the contents of this supplement.

Additional information about S. Basu Mullick is available of the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

S. Basu Mullick, Principal, Portfolio Manager

Year of Birth: 1958

Education:

Mr. Mullick graduated from Rutgers University in 1983 with a Master of Arts in Economics and an ABD in Finance in 1987.

Mr. Mullick graduated from Presidency College, India, in 1979.

Professional Designations:

None

Business Background:

Principal, Portfolio Manager, Integre Asset Management, LLC, 06/2012 to Present
Portfolio Manager and Managing Director, Neuberger Berman, 09/1998 to 12/2011.
Portfolio Manager and Managing Director, Ark Asset Management, 10/1993 to 09/1998.
General Partner, Omega Advisors, 01/1992 to 10/1993.

Item 3. Disciplinary Information

Mr. Mullick does not have any history of any disciplinary or regulatory events to disclose.

Item 4. Other Business Activities

Mr. Mullick does not engage in any other business or occupation.

Item 5. Additional Compensation

Mr. Mullick does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate or receive any compensation from anyone for client referrals.

Integre Asset Management does have several arrangements under which the firm compensates another for client referrals. The compensation is typically a percentage of the advisory fees earned by our firm.

Item 6. Supervision***Investment Reviews***

The accounts are under ongoing supervision by Basu Mullick and are also reviewed regularly by other members of the firm's investment team. Investment recommendations are also made on an ongoing basis. The firm recommends meeting with clients at least annually, and, in some cases, more

often, to review the investment outlook, investment goals and objectives, investment policies and strategies, procedures, and the portfolio positions and performance. Client portfolios also receive a more formal review on a periodic basis by Basu Mullick. More frequent reviews may be triggered by changes in market, political or economic conditions, or a client's request.

Supervisory Reviews

Mr. Weintraub, as a Principal of Integre, has the overall responsibility for the management of the firm, including the supervision of the investment professionals, and setting business strategies and initiatives, among other things and may be contacted at 212-838-2300 and by email at mweintraub@integreAM.com.

All directors, principals, portfolio managers, traders and analysts of Integre report directly or indirectly to Emanuel Weintraub.

Any clients with questions about the handling of their investments should contact the portfolio manager. All complaints should be sent to Francois Coeytaux, Chief Operating Officer.