

# Form ADV

## Part 2B – Supplemental Brochure for...

Raymond L. Eaton

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### Primoris Capital Management, LLC

October 2, 2014

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This brochure supplement ("Supplement") has been prepared by Primoris Capital Management, LLC ("Primoris") and it provides information about the qualifications and background of the supervised person named above, hereinafter referred to as "Mr. Eaton." You should review this Supplement in conjunction with Part 2A of our Form ADV, also known as our "Brochure." You should have already received a copy of our brochure and if not or if you have questions about anything in this Supplement, please contact us at 888-850-7746 or reaton@PrimorisCapital.com. Additional information about Primoris or any of our supervised persons (who are registered under our firm) is also available on the SEC's Investment Adviser Public Disclosure ("IAPD") which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The format/layout of this Supplement has been dictated by the SEC. The subsections appearing under each heading shall follow the mandated ordering of the items required to be addressed in this Supplement as set forth in the instructions and guidance issued by the SEC in regard to Part 2B of the Form ADV. Primoris' response to each such item shall immediately follow each numbered item. We encourage any reader of this Supplement to also refer to the SEC's instructions and guidance related to Part 2B of the Form ADV. Throughout this Supplement, any references to "we," "our," "ours," "us," etc. are meant to refer to Primoris.

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.

## Table of Contents

II. Educational Background and Business Experience .....	3
III. Disciplinary Information.....	3
III.(A). Criminal or Civil Matters .....	3
III.(B). Administrative Proceedings.....	3
III.(C). Self-Regulatory Organization (“SRO”) Proceedings .....	4
III.(D). Other Proceedings .....	4
IV. Other Business Activities .....	4
IV.(A). Other Investment-Related Activities .....	4
IV.(B). Other Activities .....	4
V. Additional Compensation .....	5
VI. Supervision .....	5
VII. Requirements for State-Registered Advisers.....	5
VII.(A).(1). Arbitration(s).....	5
VII.(A).(2). Civil, SRO, or Administrative Proceeding(s).....	6
VII.(B). Bankruptcy-Related Matters .....	6

## II. Educational Background and Business Experience

<b>Name:</b>	Raymond L. Eaton	
<b>Year of Birth:</b>	1965	
<b>Formal education after high school.</b>		
<b>Institution</b>	<b>Degree / Major</b>	<b>Date(s)</b>
Franklin Pierce College	B.S. Accounting/Finance	1985-1989
<b>Business background for the preceding five years.</b>		
<b>Entity</b>	<b>Position Held</b>	<b>Date(s)</b>
Catalfamo, Eaton & DeLisi, LLC	Limited Member	10/2005 to present
Primoris Capital Management, LLC	Managing Member	06/2000 to present
R.L. Eaton & Associates, Ltd.	President	05/1995 to present

## III. Disciplinary Information

This portion of this Supplement is designed to provide you any pertinent information related to any disciplinary matters involving Mr. Eaton. We are obligated to look back for a period of ten years unless more than ten years have elapsed since a particular disciplinary event but that we deem the matter significant enough that a reasonable person would find it material in evaluating Mr. Eaton or our firm.

This information below is also available via the SEC's Investment Adviser Public Disclosure ("IAPD") which can be found at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### III.(A). Criminal or Civil Matters

Has Mr. Eaton been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the Mr. Eaton...		
Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### III.(B). Administrative Proceedings

Has Mr. Eaton been involved in an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Mr. Eaton...		
Was found to have caused an investment-related business to lose its	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

authorization to do business; or		
Was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority...		
denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
barring or suspending the supervised person's association with an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
otherwise significantly limiting the supervised person's investment-related activities; or imposing a civil money penalty of more than \$2,500 on the supervised person?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### III.(C). Self-Regulatory Organization (“SRO”) Proceedings

Has Mr. Eaton been involved in a SRO proceeding in which Mr. Eaton...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of the SRO’s rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### III.(D). Other Proceedings

Has Mr. Eaton been involved in any other proceeding in which a professional attainment, designation, or license of Mr. Eaton’s was revoked or suspended as a result of a violation of rules relating to professional conduct?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
In relation to the preceding item, did Mr. Eaton resign or otherwise relinquish a professional attainment, designation, or license in anticipation of such a proceeding?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

## IV. Other Business Activities

### IV.(A). Other Investment-Related Activities

Mr. Eaton is not engaged in any other investment-related<sup>1</sup> business activities outside the scope of his investment advisory activities on behalf of Primoris.

### IV.(B). Other Activities

Mr. Eaton is not engaged in any substantial activities outside the scope of his investment advisory activities on behalf of Primoris.

<sup>1</sup> “Investment-related” means “activities that pertain to securities, commodities, banking, insurance, or real estate (including, but not limited to, acting as or being associated with an investment adviser, broker-dealer, municipal securities dealer, government securities broker or dealer, issuer, investment company, futures sponsor, bank, or savings association).”

## V. Additional Compensation

The purpose of this Item is to describe any additional compensation (outside that which has been described above in Section IV.(B).) that Mr. Eaton may receive in addition to his normal compensation for the investment advisory services he/she performs under our firm. As applicable, such other forms of compensation are denoted in the following grid. Please note that regular bonuses paid by us as part of Mr. Eaton's normal and customary compensation are not considered "additional compensation" for the purpose of this Item.

	Type of Compensation
<input type="checkbox"/>	Sales awards or other prizes
<input type="checkbox"/>	Bonus based, at least in part, on the number or amount of sales/transactions
<input type="checkbox"/>	Bonus based, at least in part, on client referrals
<input type="checkbox"/>	Bonus based, at least in part, on the # or type of new accounts opened
<input checked="" type="checkbox"/>	None

## VI. Supervision

As part of our overall compliance and supervisory process, we monitor the advisory activities of all of our supervised persons. As part of the supervisory process over the advisory activities of all of our supervised persons, Mr. Eaton serves the role of Designated Supervisor for PCM and in that capacity, Mr. Eaton shall carry out the following general supervisory steps.

- Periodic review of customer account activity
- Periodic review of electronic and other correspondence
- Observation during client meetings and/or phone calls
- On-site inspection of each of our supervised person's office location (if other than the our main office)

In order to ensure that we are effectively and consistently carrying out our supervisory process over all of our supervised persons' advisory activities, we maintain a set of Written Supervisory Procedures ("WSP") that, among other things, address matters such as supervision of the activities of our supervised persons like Mr. Eaton. Our WSP manual is the guiding force behind all of our supervisory functions and is subject to the regular inspection by any regulatory bodies having jurisdiction over our investment advisory activities.

### Mr. Eaton's contact information:

Raymond L. Eaton  
Chief Compliance Officer  
888-850-7746

## VII. Requirements for State-Registered Advisers

The information below will supplement the information previously provided in Item 3 of this Supplement.

### VII.(A).(1). Arbitration(s)

Has Mr. Eaton been involved in an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following matters?		
A investment or an investment-related business or activity;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Fraud, false statement(s), or omissions;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Theft, embezzlement, or other wrongful taking of property;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Bribery, forgery, counterfeiting, or extortion; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Dishonest, unfair, or unethical practices.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### **VII.(A).(2). Civil, SRO, or Administrative Proceeding(s)**

Has Mr. Eaton been involved in an award or otherwise been found liable in a civil, SRO, or administrative proceeding involving any of the following matters?		
A investment or an investment-related business or activity;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Fraud, false statement(s), or omissions;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Theft, embezzlement, or other wrongful taking of property;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Bribery, forgery, counterfeiting, or extortion; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Dishonest, unfair, or unethical practices.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

### **VII.(B). Bankruptcy-Related Matters**

During the past ten years, Mr. Eaton has not been the subject of a bankruptcy petition(s).