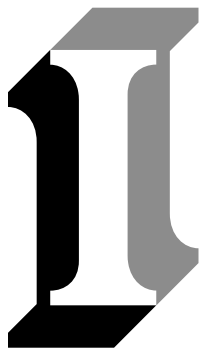


**Item 1: Cover Page  
Part 2A of Form ADV: Firm Brochure  
March 2020**



**INTEGRAL**  
**WEALTH MANAGEMENT**

**605 E Main Street  
Turlock, CA 95380  
(209) 633-3101**

**[www.integral-wealth.com](http://www.integral-wealth.com)**

This brochure provides information about the qualifications and business practices of Integral Investment Advisors, Inc. dba Integral Wealth Management. If clients have any questions about the contents of this brochure, please contact us at (209) 633-3101, or email [info@integral-wealth.com](mailto:info@integral-wealth.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority. Additional information about our firm is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #146569.

Please note that the use of the term "registered investment adviser" and description of our firm and/or our associates as "registered" does not imply a certain level of skill or training. Clients are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise clients for more information on the qualifications of our firm and our employees.

## Item 2: Material Changes

Integral Wealth Management is required to notify clients of any information that has changed since the last annual update of the Firm Brochure ("Brochure") that may be important to them. Clients can request a full copy of our Brochure or contact us with any questions that they may have about the changes.

Since the last annual amendment filed on 03/27/2019, the following changes have been made:

- Our firm has discontinued our relationship with Fidelity in favor of TD Ameritrade. Please refer to Item 12 for additional information.
- TD Ameritrade recently eliminated transaction fees for U.S. listed equities and exchange traded funds.
- TD Ameritrade announced that it will be acquired by Charles Schwab. The acquisition is expected to be completed in the fall of 2020. We will provide additional information about the acquisition as it becomes available.
- Our firm has updated our services to include Retirement Plan Consulting. Please refer to Item 4 and Item 5 for additional information.
- Our firm has updated our Investment Management fees by replacing our tiered fee structure with a flat rate not to exceed 1.50% of assets under management. The rate charged has not increased for any existing clients. In addition, our firm has clarified the billing process for our Investment Management service. Please refer to Item 5 for additional information.
- Our firm has updated our Financial Planning fees to remove our hourly rate. Clients will only be charged a flat fee moving forward. Please refer to Item 5 for additional information.
- Our firm has been determined to have custody of certain assets due to a supervised person being engaged by clients to act as a trustee for their trusts. Please refer to Item 15 for additional information.
- Our firm no longer utilizes sub advisors. Therefore, all references have been removed from this Brochure.

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## Item 4: Advisory Business

Integral Investment Advisors, Inc. dba Integral Wealth Management (“our firm” and “we”) is a California corporation registered as an investment adviser under the oversight of the Securities and Exchange Commission. Our principal place of business is located in Turlock, California. Jodi Ann Karambela is the President of Integral Investment Advisors, Inc. which she founded in 2008. Ms. Karambela is the majority owner and Michael Abram, Vice President and Chief Compliance Officer, is a minority owner.

The purpose of this Brochure is to disclose the conflicts of interest associated with the investment transactions, compensation and any other matters related to investment decisions made by our firm or its representatives. As a fiduciary, it is our duty to always act in the client’s best interest. This is accomplished in part by knowing our client. Our firm has established a service-oriented advisory practice with open lines of communication for many different types of clients to help meet their financial goals while remaining sensitive to risk tolerance and time horizons. Working with clients to understand their investment objectives while educating them about our process, facilitates the kind of working relationship we value.

### **Types of Advisory Services Offered**

#### **Investment Management:**

Our firm specializes in designing diversified portfolios that illustrate a client’s financial objectives and individual goals. Our investment style is highly customized to our client’s risk tolerance, maximizing the preservation of capital and after-tax total return. All portfolio decisions are made in accordance with each client’s suitability profile.

Our primary focus is providing structured portfolio management using asset allocation. We have a strong bias towards constructing total return portfolios and have a tactical slant in sectors that have long term growth potential. We use a “Top Down” approach when assessing portfolio weightings to take advantage of trends in the economy, while still maintaining a diversified approach. In addition, as part of our Investment Management service, our firm will provide financial planning on an as-needed basis depending on a number of factors including the client’s financial condition, current situation, and future priorities. This service is designed to assist clients in reaching their financial goals through developing comprehensive financial plans and analyses.

#### **Financial Planning & Consulting:**

Our firm provides a variety of standalone financial planning services to help advise clients on how to reach their financial goals through developing comprehensive financial plans and analyses. We collaborate with clients to understand their current financial condition and future priorities. Careful analysis is conducted that illustrates the likelihood of reaching future goals after taking various courses of action. A recommendation is made that best balances the current and future priorities for the client as well as the plan’s likelihood for success. Financial plans are reviewed periodically and updated as appropriate when there are changes to a client’s financial condition and goals. Sometimes the comprehensive nature of the plan lends itself to collaborating with a client’s estate planning attorney or accountant on estate planning or tax planning projects.

## **Retirement Plan Consulting:**

Our firm provides retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising may include:

- Establishing an Investment Policy Statement – Our firm will assist in the development of a statement that summarizes the investment goals and objectives along with the broad strategies to be employed to meet the objectives.
- Investment Options – Our firm will work with the Plan Sponsor to evaluate existing investment options and make recommendations for appropriate changes.
- Asset Allocation and Portfolio Construction – Our firm will develop strategic asset allocation models to aid Participants in developing strategies to meet their investment objectives, time horizon, financial situation and tolerance for risk.
- Investment Monitoring – Our firm will monitor the performance of the investments and notify the client in the event of over/underperformance and in times of market volatility.
- Participant Education – Our firm will provide opportunities to educate plan participants about their retirement plan offerings, different investment options, and general guidance on allocation strategies.

In providing services for retirement plan consulting, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, “Excluded Assets”). All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans (“Plan”) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). If the client accounts are part of a Plan, and our firm accepts appointment to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

## **Tailoring of Advisory Services**

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For Investment Management clients, our firm constructs portfolios to match each client’s unique risk tolerance, financial objectives, and individual requirements. We believe that our approach better enables our clients to meet their financial goals. Once an individual client’s suitability profile is obtained, we are disciplined about rebalancing the investment portfolio. Conversely, our firm will offer general investment advice to our Financial Planning and Retirement Plan Consulting clients.

Each Investment Management client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account and may result in our firm requesting the client engage with our firm on a non-discretionary basis instead.

## **Participation in Wrap Fee Programs**

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Our firm does not offer or sponsor a wrap fee program.

## **Regulatory Assets Under Management**

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Our firm manages \$43,127,676 on a non-discretionary basis and \$117,979,476 on a discretionary basis as of February 19, 2020.

## **Item 5: Fees & Compensation**

### **Compensation for Our Advisory Services**

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#### **Investment Management Fees:**

In consideration of the Investment Management services provided by our firm, clients pay our firm an annual fee quarterly in arrears. Fees will be deducted directly by the custodian from client's accounts unless otherwise agreed. The fee will be equal to the agreed respective percentage per annum, based on the average daily market values of the managed accounts for the actual number of days in the previous quarter, offset by five (5) business days.

The maximum annual fee charged will not exceed 1.50%. Fees to be assessed will be outlined in the advisory agreement to be signed by the Client when we begin our professional relationship.

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded (or, if there shall be no sales on such date, then at the mean between the closing bid and asked prices on such date). Notwithstanding the above, our fees are generally negotiable. As part of this process, Clients understand the following:

- a) The client's independent custodian sends statements at least quarterly showing the market values for each security included in the assets and all account disbursements, including the amount of the advisory fees paid to our firm. Clients should verify the accuracy of these calculations;
- b) Clients will provide authorization permitting our firm to be directly paid by these terms. Our firm will send an invoice directly to the custodian; and
- c) If our firm sends a copy of our invoice to the client, legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

#### **Financial Planning Fees:**

Our firm charges on a flat fee basis for Financial Planning services. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Flat fees range from \$1,500 to \$10,000.

Our firm will invoice clients for this service upon delivery of their plan. All invoices are due within 10 days of financial plan being delivered. Our firm may make special arrangements with clients wishing to retain financial planning as an ongoing service. However, our firm will not require a retainer in excess of \$1,200 when services cannot be rendered in six months.

The planning fee also includes the time and activities necessary to work with client's attorney and/or accountant in reaching agreement on solutions, as well as implementing all appropriate documents. We are not responsible for attorney or accountant fees charged to clients as a result of the above activities.

### **Retirement Plan Consulting:**

Our Retirement Plan Consulting services are billed a fee based on the percentage of Plan assets under management. Fees based on a percentage of managed Plan assets will not exceed 1.50%. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed consulting agreement.

### **Other Types of Fees & Expenses**

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Clients will incur transaction fees for trades executed by their chosen custodian, via individual transaction charges. These transaction fees are separate from our firm's advisory fees and will be disclosed by the chosen custodian. TD Ameritrade, Inc. ("TD Ameritrade"), does not charge transaction fees for U.S. listed equities and exchange traded funds.

Clients may also pay holdings charges imposed by the chosen custodian for certain investments, charges imposed directly by a mutual fund, index fund, or exchange traded fund, which shall be disclosed in the fund's prospectus (i.e., fund management fees, initial or deferred sales charges, mutual fund sales loads, 12b-1 fees, surrender charges, variable annuity fees, IRA and qualified retirement plan fees, and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from custodian, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. Our firm does not receive a portion of these fees.

### **Termination & Refunds**

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Either party may terminate the Investment Advisory Agreement signed with our firm for our Investment Management services in writing at any time. Upon notice of termination pro-rata advisory fees for services rendered to the point of termination will be charged contingent on the number of days the account was open during the quarter. If advisory fees cannot be deducted, our firm will send an invoice for due advisory fees to the client.

Financial Planning clients may terminate their agreement at any time before the delivery of a financial plan by providing written notice. For purposes of calculating fees, all work performed by us up to the point of termination shall be calculated at the hourly fee currently in effect. Clients will receive an invoice based on the time and effort expended by our firm.

Either party may terminate the Retirement Planning Consulting Agreement at any time by providing written notice to the other party. Clients will be charged on a pro-rata basis which takes into account work completed by our firm on behalf of the client. Clients will incur charges for bona fide advisory services rendered up to the point of termination (determined as receipt of said written notice) and such fees will be due and payable by the client.

### **Commissionable Securities Sales**

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Our firm is a fee-only investment advisory firm paid on a percentage of client assets managed. This means that no supervised person associated with us receives or accepts any compensation for the

sale of securities or investment products. Our firm believe this method of compensation minimizes conflicts of interest.

## **Item 6: Performance-Based Fees & Side-By-Side Management**

Our firm does not charge performance-based fees.

## **Item 7: Types of Clients & Account Requirements**

We do not have any set asset requirements for opening or maintaining accounts and provide investment advice to the following types of clients:

- High Net Worth Individuals;
- Individuals (other than High Net Worth individuals);
- Charitable Organizations;
- Pension and Profit Sharing Plans;

Because each client is unique, we encourage involvement in the planning and processes involved in the management of client accounts. Such involvement does not have to be time consuming, however we want our clients to remain informed and have a sense of security about their investments.

## **Item 8: Methods of Analysis, Investment Strategies & Risk of Loss**

We offer advice on investments primarily including (but not limited to) the following:

- Equity securities such as:
  - Exchange-listed securities including stocks and Exchange Traded Products such as ETFs.
  - Securities traded over-the-counter
  - Foreign issuers
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal debt securities
- Investment company securities such as:
  - Mutual fund shares
- United States government debt securities
- Options contracts on:
  - Securities

The primary investment strategies used to implement investment advice given to clients include long-term (securities held at least one year) and short-term (securities sold within a year) purchases, taking into consideration a client's tax situation when buying or selling securities and mutual funds.



Our firm primarily researches and analyze securities using fundamental and technical methods. The main sources of information we rely upon when researching and analyzing securities include traditional research materials such as financial newspapers and magazines; research materials prepared by others; filings with the Securities and Exchange Commission; and company press releases.

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**Risk of Loss**

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Our firm will use our best judgment and good faith efforts in rendering services to our clients. However, we cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. Clients assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political, and business risks. However, nothing in our Agreement shall relieve us from any responsibility or liability we may have under state or federal statutes. Clients should note that investing in securities involves risk of loss that clients should be prepared to bear. As noted above, while the stock market may increase and the account(s) could enjoy a gain, it is also possible that the stock market may decrease and the account(s) could suffer a loss. It is important that clients understand the risks associated with investing in the stock market, and that their assets are appropriately diversified in investments. Clients are encouraged to ask our firm any questions regarding their risk tolerance.

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**Description of Material, Significant or Unusual Risks**

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While all investing involves risks and losses can and will occur, our advisory services generally recommend a broad and diversified allocation of equities, ETFs, and mutual funds thereby reducing specific risks associated with a concentrated or undiversified portfolio.

### **Item 9: Disciplinary Information**

Our firm is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm or the integrity of our management. We have no information to disclose applicable to this item.

### **Item 10: Other Financial Industry Activities & Affiliations**

Our firm does not participate in any other material activities and has no other financial industry affiliations to disclose.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading**

We have a Code of Ethics which all employees are required to follow. The Code of Ethics outlines proper conduct related to all services provided to clients. Prompt reporting of internal violations is mandatory. Our chief compliance officer regularly evaluates employee performance to ensure compliance with the Code of Ethics. A copy of the Code of Ethics is available to any client or prospective client upon request.

Individuals associated with our firm may buy and sell some of the same securities for their personal accounts that we buy and sell for our clients. In general, we attempt to avoid trading securities in personal accounts during the same trading day that we are trading the same position in client accounts. If, however, the transaction is going to be aggregated into a block trade, then we may include ourselves in that aggregated trade. In all other instances, where appropriate, we will purchase a security for all client accounts for which the investment is appropriate before purchasing any of the securities for personal account(s) and, likewise, when determining that securities should be sold, will cause these securities to be sold from all client accounts prior to permitting the selling of the securities from personal account(s). In some cases, we may buy or sell securities in personal accounts for reasons not related to the strategies adopted by our clients.

When we have been newly engaged by an Investment Management client for whom we expect to recommend securities in which individuals associated with our firm hold a substantial position, we will notify the new client of our policies in respect to trading in personal accounts. We will disclose to our clients any material conflict of interest relating to us, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

## **Item 12: Brokerage Practices**

### **Selecting a Brokerage Firm**

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Our clients' assets are held by independent third-party custodians. Except to the extent that a client directs otherwise, we may use our discretion in selecting or recommending the custodian. Clients are not obligated to effect transactions through any custodian recommended by us. In recommending a custodian we will comply with our fiduciary duty in accordance with the Securities Exchange Act of 1934, to obtain best execution and will take into account such relevant factors as

- Price;
- The custodian's facilities, reliability, and financial responsibility;
- The ability of the custodian to effect transactions, particularly with regard to such aspects as timing, order size, and execution of order;
- The research and related brokerage services provided by such custodian to us, notwithstanding that the account may not be the direct or exclusive beneficiary of such services; and
- Any other factors that we consider to be relevant

We participate in the institutional customer program of TD Ameritrade. We may recommend independent third-party custodian TD Ameritrade to clients for custody and brokerage services. TD Ameritrade is a member of FINRA and SIPC.

Our use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934 which provides a “safe harbor” for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. Per Section 28(e), we will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in the performance of our overall responsibilities to all our clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge.

Our firm provides investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when our firm believes that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, our firm attempts to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation, and availability of funds using price averaging, proration, and consistently non-arbitrary methods of allocation.

### **Item 13: Review of Accounts or Financial Plans**

Our management personnel or financial advisors reviews accounts internally on at least a quarterly basis. Our management or financial advisors review accounts with clients on at least an annual basis for our Investment Management clients when they are contacted. The nature of these reviews is to ensure clients’ suitability profiles are up to date and accounts are appropriately positioned based on their objectives, risk tolerance, and current economic conditions.

More frequent reviews may also be triggered by a change in a client’s investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in macro-economic climate.

Financial Planning clients receive their financial plans and recommendations at time service is completed. Depending on the type of Financial Planning service requested, we will meet as needed with clients to discuss any potential changes to their financial plan.

Retirement Plan Consulting clients receive reviews of their retirement plans for the duration of the service. Our firm also provides ongoing services where clients are met with upon their request to

discuss updates to their plans, changes in their circumstances, etc. Retirement Plan Consulting clients do not receive written or verbal updated reports regarding their plans unless they choose to engage our firm for ongoing services.

## **Item 14: Client Referrals & Other Compensation**

### **Referral Fees**

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Our firm does not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940.

## **Item 15: Custody**

### **Deduction of Advisory Fees:**

Clients receive standard account statements from the custodian of their accounts generally on a monthly basis, but in any event, no less than quarterly. We urge all clients to carefully review statements from the custodian and compare these to any reports that we may provide to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

We shall have no liability to a client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount of such loss is covered by the Securities Investor Protection Corporation ("SIPC") or any other insurance which may be carried by the custodian. Clients should understand that SIPC provides only limited protection for the loss of property held by a custodian.

### **Trustee for Client Accounts:**

Representatives of our firm act as a trustee to client accounts. As such, our firm is deemed to have custody. The client funds and securities of which our firm has custody are verified by actual examination at least once during each calendar year by an independent public accountant ("IPA") registered with the Public Company Accounting Oversight Board ("PCAOB"), at a time that is chosen by the accountant without prior notice or announcement to our firm and that is irregular from year to year. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

### **Third Party Money Movement:**

On February 21, 2017, the SEC issued a no-action letter ("Letter") with respect to Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client

funds to a third party under a standing letter of instruction (“SLOA”) is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client’s qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

## **Item 16: Investment Discretion**

Clients have the option of providing our firm with investment discretion on their behalf, pursuant to an executed Investment Advisory Agreement. By granting investment discretion, clients authorize our firm to execute securities transactions, determine which securities are bought and sold, and decide the total amount to be bought and sold. Should clients grant our firm non-discretionary authority, our firm would be required to obtain the client’s permission prior to effecting securities transactions. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm’s written acknowledgement.

## **Item 17: Voting Client Securities**

Our firm does not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, our firm will forward them to the appropriate client and ask the party who sent them to mail them directly to the client in the future. Clients may call, write, or email us to discuss questions they may have about particular proxy votes or other solicitations.

## **Item 18: Financial Information**

Our firm is not required to provide financial information in this Brochure because:

- Our firm does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months.
- Our firm manages some client assets on a discretionary basis; however, we have no financial commitments which would impair our ability to meet the contractual and fiduciary commitments to our clients.
- Our firm has never been the subject of a bankruptcy proceeding.