



# INTEGRATED WEALTH MANAGEMENT

YOUR GOALS — OUR EXPERTISE

4800 N. Scottsdale Rd.

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480 663 6000

## WRAP FEE PROGRAM DISCLOSURE BROCHURE (Form ADV Part 2A, Appendix 1) Mar 30, 2021

This wrap fee program brochure provides information about the qualifications and business practices of Integrated Wealth Management LLC, an SEC registered investment advisor.\* If you have any questions about the contents of this brochure, please contact us at 480 663 6000. 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 Integrated Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our Firm SEC Number is 801-60524.

\*Registration with the SEC does not imply a certain level of skill or training.

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Securities offered through Geneos Wealth Management, Inc. Member FINRA/SIPC. Investment advisory services offered through Integrated Wealth Management, LLC.

# MATERIAL CHANGES

On July 28, 2010, the United States Securities and Exchange Commission ("SEC") published "Amendments to Form ADV" which amended the disclosure document provided to clients as required by SEC and state rules. This item discusses specific material changes that are made to the disclosure brochure and provide readers with a summary of such changes.

Pursuant to new rules, Integrated Wealth Management, LLC. ("IWM") will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the firm's fiscal year end, December 31. This means that if there were any material changes over the past year clients will receive a summary of those changes no later than April 30. At that time, IWM will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for IWM at any time by contacting us at 480-663-6000.

## Material changes since the date of last annual update (Mar 25, 2020):

Updated the financial planning process in Description of Client Services section

Added Focused Equity Programs to Description of Client Services section

Added 401(k) Investment Advisory Services to Description of Client Services section

The PPP loan received in 2020 and previously disclosed has been forgiven.

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# SERVICES, FEES AND COMPENSATION

Integrated Wealth Management LLC ("IWM") offers services under a wrap fee program called the Strategic/Tactical UMA Program ("Program") where we provide investment management services defined as giving continuous investment advice to you (or making investments for you) through an investment model. IWM will work with you to help identify your financial situation, investment objectives, investment time horizon, risk tolerance, and any specific investment restrictions relating to the Account being established. This information will be used to determine the proper investment model ("Model") for your Account. Our Models utilize strategic and/or tactical asset allocation but do not attempt to engage in short term market timing or trading. Our Models typically allocate portions of the portfolio (referred to as sleeves) to multiple diverse investment strategies created by different strategists. In some cases these strategies may be encapsulated into a single investment like an exchange traded fund or mutual fund. In other cases the strategists may have agreements with the Platform Manager or IWM directly to provide allocation instructions (referred to as trading signals) to the Platform Manager to buy and or sell securities. As portfolio manager, IWM provides Model construction, ongoing evaluation and selection of the strategists and strategies, and ongoing adjustment and balancing of portfolios. Various asset types are utilized including: no-load mutual funds, load waived mutual funds, equities, exchange traded funds, stocks, cash, and cash equivalents.

Alternative investments including, but not limited to, Unit Investment Trusts, Real Estate Investment Trusts and limited partnerships may be held within the account as a convenience to the customer, but are not included as part of the managed Model. These investments are not subject to Wrap Fees but may be subject to Custodial or other account servicing fees not charged by IWM. Other investments which are unique to a particular client and not part of the managed Model may also be held within the account. These investments are not subject to Wrap Fees but may be charged Custodial or other service fees, and may also be charged Advisory fees by IWM.

IWM has an agreement with Geneos Wealth Management Inc. ("Geneos" or "Platform Manager") to provide Platform Management services to the Program. The Platform Manager directs the purchasing and selling of securities in the Account to maintain the allocation to the Model selected for that account. The Platform Manager also sells securities to free up cash for Client withdrawals. The Platform Manager allocates a small portion of the Client's Account as a cash buffer to facilitate trading and management fee disbursements. The Platform Manager has a fully disclosed clearing arrangement with Pershing LLC ("Custodian"). The Custodian shall execute all purchase and sale orders directed by IWM through Geneos, and perform the clearance of the same. The Custodian shall maintain custody of all Account assets and provide custodial functions will include, but not be limited to, crediting of interest and dividends on Account assets and crediting of principal on called or matured securities in the Account, together with other functions customarily performed with respect to securities brokerage accounts.

You are required to use only those broker-dealers and custodians available in the Program. We do not allow you to direct brokerage within the Program.

By executing an agreement for services with us, we will be granted full discretionary trading authority to determine the model allocations, portfolio strategies, securities and quantity of securities to be bought and sold, the time of execution and the price at which the trades will be executed without consulting with you before implementing any transactions.

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You can place reasonable limitations and restrictions in relation to the discretionary authority. Any restrictions must be submitted to us in writing. In certain instances, particularly model-based investment programs, accepting such restrictions would not allow us to fulfill our obligations to the client (i.e., violation of the Investment Advisory Agreement or the implementation of the investment strategy). In such instances, IWM will work with you to select an investment strategy suitable for your restrictive guidelines. However, IWM reserves the right to refuse accounts into the Program based on client-imposed restrictions.

We do not have access to or custody of your funds and/or securities with the exception of having advisory fees deducted from your account and paid to us. Any fee deduction is done pursuant to your prior written authorization.

As a participant in the Program, you will pay an annualized Wrap Fee of up to a maximum of 2.50%, paid quarterly in advance, based on the previous period ending balance. During the billing quarter, asset based fee adjustments will be made calculated daily to reflect daily appreciation or depreciation in account value. Fee adjustments and refunds will be calculated to reflect to any daily change in value including additions and withdrawals, with the cumulative fee adjustments made at the end of each quarter. Terminated accounts will be credited for a pro rata portion of the advance billed fees. You are responsible for paying fees only for services rendered until the effective date of termination.

The Wrap Fee consists of the Advisory Fee received by IWM and the Model Cost which is received by the Platform Manager (Geneos) and which includes trading expenses and compensation for the various strategists. Geneos and/or Pershing reserve the right to charge various fees including but not limited to: postage, account termination, maintenance, inactivity and other services, with such fees disclosed in the Geneos New Account Application.

The Advisory Fee you agree to with IWM will be in effect until either the fee is reduced by IWM, or you agree in writing to an increase. The Model Cost will vary based on the Model allocation across various strategies with different costs, but will never be more than 0.70% or 70 basis points. Each model's specific cost is disclosed to you within the Model Cost Disclosure. These costs are subject to change and you may request updated cost information from IWM at any time. Any changes to the Advisory Fee will be effective for the billing cycle following the Program Manager's receipt of the change request. **Any changes to the Model Cost Fee will be effective when the model cost changes.**

Fees charged to the account may be higher or lower than fees charged by other investment advisory firms or representatives for similar services.

Neither IWM nor the Program Manager will be compensated on the basis of a share of the capital gains or capital appreciation of the Client funds and/or Account, separately from the agreed to fee schedule.

The trading fees related to activity outside of Models but within the Account are in accordance with the pricing information provided to you by IWM. These charges are subject to change and you may request updated pricing information from IWM at any time. IWM will not receive any portion of the trading fees.

The Wrap Fee includes trading costs for activity within the models. It may cost you more or less than if you paid the ticket charges at the time of trade execution. The amount of trades placed in the account has a bearing upon the relative cost of the program.

For a given period of time, if there are only a few trades placed in the account it is possible that paying for advisory services and ticket charges separately may be less expensive than the fee. The opposite is also true; if there are a large amount of trades placed in the account over a given period of time, it is possible that paying for advisory services and ticket charges separately may be more expensive.

Certain strategies utilize mutual funds. You should be aware that mutual funds generally charge a fee, called an expense ratio for their management services. These fees are disclosed in the fund prospectus. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services managing the fund. These fees are in addition to the wrap fees paid by you to IWM. Performance figures quoted by mutual fund companies in various publications are after their (expense ratio) fees have been deducted.

Certain strategists may utilize mutual funds for which they are the sponsors/managers. Strategists utilize such funds in your account when it is believed that the overall performance of the fund, after taking into account expense ratio fees, merits inclusion. However, receiving these fees could represent an incentive for the strategist to include funds from which they receive compensation from the fund expense ratio, therefore creating a conflict of interest for the strategist.

Mutual funds are permitted, under Section 12(b)-1 of the Securities Exchange Act, to compensate paying for distribution charges out of fund assets. These charges principally cover advertising, promotion, and shareholder servicing expenses incurred by the fund and are included in the expense ratio. Our Platform provider, Geneos, as a broker-dealer, is the recipient of these fees. We endeavor to avoid mutual funds which charge 12(b)-1 fees. However, in some cases funds charging these fees are the best choice, or are long term client holdings transferred into the account which would generate a taxable event if liquidated and replaced. In such cases, Geneos rebates the fees directly to Program clients whose portfolios include the fund.

## **ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

### **MINIMUM ACCOUNT SIZE**

Typically, we require a minimum account size of \$25,000 to establish and maintain a managed account. However, exceptions may be granted to this account minimum at our discretion, usually based on your specific situation. For example, we may accept a \$20,000 Roth IRA account because you also have a \$150,000 joint account. Certain portfolio strategies incorporated into our Models may have their own minimums, requiring us to have a higher minimum account size for the total account in that Model.

### **TYPES OF CLIENTS**

IWM clients include individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and other types of business entities.

# PORTFOLIO MANAGER AND STRATEGIST SELECTION AND EVALUATION

IWM is the overall portfolio manager for the Program. Investment Models are constructed and managed through the IWM investment committee, and are reviewed monthly. The Model defines the selection and weighting of the diversified strategies. Performance of a strategy or changing market conditions may result in its replacement by a different strategy or a change to its weighting in the Model.

Third-party strategists and strategies are screened by Geneos before they are included in the Platform, and then further evaluated by IWM before incorporation into a Model.

Geneos evaluates each strategist before their strategies are included in the Platform. Each strategist must have at least \$100 million in assets under management and must have a minimum of 3 year track record as an asset manager. The specific model does not require a 3 year track record, but the portfolio strategist does. Geneos also reviews the type of model, strategic versus tactical for example, the model holdings, portfolio turnover, and uniqueness compared to other models on the Platform.

The performance of each strategy and Model is calculated by Morningstar using industry standard methods. Morningstar uses a geometrically linked return method also known as Time Weighted Return. Reviews of model performance are based upon the calculated performance generated by Morningstar for each model. Geneos, the Platform Manager, maintains only hypothetical returns for each strategy and Program Model and neither IWM nor Geneos maintain any composites.

IWM performs additional due diligence before incorporating a particular strategy into a Model. This includes: a review of the Geneos due diligence, an analysis of the theory behind the strategy, an analysis of if and how risk mitigation is built into the strategy, and an analysis of how the particular strategy might contribute to improved risk-return when blended with other strategies into a Model.

There are strategies available on the Platform that are created under the PDA (Portfolio Design Advisors, Inc.) name. Key Portfolio Design Advisors employees are also employees of Geneos and in that capacity provide support to IWM's investment committee, creating a conflict of interest in any due diligence. In such cases IWM shall rely on its own due diligence of those strategies, which includes direct and routine contact with the PDA portfolio managers.

## **DESCRIPTION OF ADVISORY SERVICES OFFERED**

IWM offers integrated financial planning and execution, developing a Financial Life Plan tailored to your specific goals and concerns, and implementing that plan through investment management, a detailed retirement forecast, and other consultative services. These include income taxes, insurance protection, and estate planning.

The Strategic/Tactical UMA Wrap Fee Program, the subject of this brochure, is one of several investment programs IWM offers to our advisory clients.

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## Our Financial Planning Process

Discovery Phase. Each client relationship begins with a discovery phase that occurs before you agree to engage us. During Discovery, we focus to understand your goals and financial picture. The review of your financial picture includes an analysis of current and projected income, income taxes, spending (current and retirement), insurance protection, estate planning, and other items unique to you. For investment strategies to be sustainable requires that you are comfortable with them, and with us as your advisor. We employ Riskalyze, a sophisticated risk tolerance tool to assess your temperament, your current portfolio, and the one we initially propose. Our financial planning process is designed for long term engagements. During the Discovery phase we want to make sure we are a good fit to work together.

The key deliverable from Discovery is a Recommendation which includes an initial investment proposal and the services we propose to provide to implement your Financial Life Plan. You are free to retain the Recommendation even if you choose to not engage IWM as your advisor.

Financial Life Plan Implementation. Your Financial Life Plan at minimum includes an investment management plan and a detailed retirement forecast. Based on your unique needs, the plan may integrate a broad range of other financial topics including insurance protection, education planning, income tax planning, and estate planning.

The investment management portion of the plan, which we begin to implement upon engagement, defines a comprehensive allocation of assets, targeting the achievement of your long-term goals within the parameters of your risk tolerance.

Building on what we learned during Discovery, we work with you to develop more detailed goals and implementation steps of your Financial Life Plan. A key element of the plan is the retirement forecast, which projects your income and expenses during retirement, and which we which we will use to refine your savings and investment plans.

Regular and rigorous monitoring and updating reviews are critical to our implementation process. Over the course of our engagement, things will change, and our plan needs to be evergreen. During each review with you, we will revisit all elements of the Financial Life Plan. Review meeting goals are: to confirm we are still focused on the right objectives for you; to review the progress we are making toward those objectives, and agree to make any changes which are necessary.

When clients reach retirement and require periodic withdrawals, IWM structures a retirement income plan for you which automatically provides the cash to fund that income, and considers IRS-mandated required minimum distributions for clients over the age of 72.

Investment Advisory Services and Programs. Before making any investment recommendation, IWM works with you as described above to understand your financial situation, investment objectives, investment time horizon, risk tolerance, and any specific investment restrictions on what we invest in. This information is used to determine the proper investment strategy for you.

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A unique attribute of IWM's Investment Strategy is "diversification by strategy". We move beyond more conventional diversification by asset class with the intent to provide an additional measure of risk mitigation without sacrificing performance. Different strategies are also carefully mapped to your qualified vs. non-qualified accounts to optimize after-tax returns.

In addition to the Strategic/Tactical UMA Wrap Fee Program described in this brochure, IWM offers the following separately managed account programs which are not wrap fee programs (trading fees are not included):

Strategic/Tactical Variable Annuity Program (only available on Nationwide Monument Advisor Variable Annuity contracts). IWM's Investment Committee has created a series of models allocating the contract to variable annuity sub-accounts. The models are periodically reviewed by the Investment Committee and may be adjusted for market conditions or performance of a particular sub-account.

Strategic Asset Allocation Program. Separately managed account allocations are constructed uniquely for each client using both short and long-term trend analysis. Strategic Asset Allocation accounts are typically only reallocated on a long-term basis and achieve their objectives through appropriate allocation, superior investment screening and selection.

Focused Equity Program(s). Separately managed account allocations are focused on a specific theme or strategy. These are developed based on Investment Committee-directed research, managed by IWM, and typically concentrate on an emerging theme or growth trend. The accounts are typically invested in individual equities or narrowly focused ETFs.

Investment Advisory Agreement. In the context of the overall engagement, IWM manages some or all of the implementation of the Financial Life Plan we develop together. Realistic and measurable objectives and goals are set and strategies and tactics to reach those goals are defined and agreed to. As time progresses and progress is made, your goals and objectives may evolve based on life plan changes, changes in the external environment, or your specific needs. IWM's evergreen implementation stays linked - strategies evolve and new tactics are employed.

An Investment Advisory Agreement is signed by you for each account we manage. The Investment Advisory Agreement includes the terms and conditions of investment management. (The term management defines an agreement where IWM has discretionary authority to manage/trade assets directly or to hire-fire third party managers or sub-advisors). This management service is provided on an advisory fee basis.

You may terminate any advisory agreement at any time by notifying IWM in writing. IWM may terminate any of the advisory agreements at any time by notifying you in writing. As described in the Advisory Fee Schedule section of this document, IWM will refund any unearned portion of management fees paid in advance based on a pro rata calculation.

## Corporate Retirement Plan Investment Advisory Services.

Defined Benefit Plans IWM specializes in defined benefit plans for smaller businesses which can provide significant tax benefits for the owners, and we have developed investment strategies particularly suited for DB plan needs. These are typically managed as part of the owner's Financial Life Plan.

401(k) Plans IWM provides 401(k) plan investment advisory services to small business plan sponsors to assist in the selection, monitoring, and replacement of plan investment alternatives in accordance with ERISA Regulations. This also includes assistance in participant communication/education and plan monitoring.

## Wealth Management Advisory Services

Although you are not engaging IWM as your tax, estate, or legal professional, your Financial Life Plan may include these elements, and on more than an occasional basis, IWM may furnish advice to you on these matters. IWM does routinely work together with your other professionals and can also refer you to such professionals if it makes sense.

## **SERVICES TAILORED TO CLIENT NEEDS**

Your unique situation informs the Financial Life Plan we develop together, with your objectives, goals, and circumstances shaping the strategies we employ and the services we provide.

You may impose restrictions on investing in certain securities or types of securities. In certain instances, particularly model-based investment programs, accepting such restrictions would not allow IWM to fulfill our obligations to you (i.e., violation of the Investment Advisory Agreement or the implementation of the investment strategy). In such instances, IWM will work with you to select an investment strategy suitable to your restrictive guidelines.

## **WRAP FEE PROGRAM VERSUS OTHER MANAGED ACCOUNT PROGRAMS**

IWM is the overall portfolio manager for the IWM Strategic/Tactical UMA Wrap Fee Program. We utilize the same management approach as we do for our non-wrap fee managed programs. In the Wrap Fee program, IWM receives a portion of the total client billing (called the Advisor Fee), which is specifically disclosed in the Wrap Fee Agreement. For other managed account programs, IWM also receives advisory fees.

## **PERFORMANCE FEES AND SIDE BY SIDE MANAGEMENT**

In neither the Strategic/Tactical UMA Program nor any other IWM managed account program are IWM fees based on a share of the capital gains or capital appreciation of managed securities (i.e., performance-based fees). IWM does not have Side-by-side management conflicts.

## **METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS**

IWM employs fundamental, technical, and cyclical analysis methods. The sources for information are primarily professional research services and publications.

IWM also utilizes information from third party investment managers we use in our programs, other investment managers, and general and financial news sources.

For the IWM Strategic Asset Allocation (IWM SAA) Program, IWM utilizes various asset allocation tools to determine asset class weightings. IWM also combines input from multiple sources including client risk measurements and objectives, technical and fundamental analysis, relative strength analysis and professional research services and publications.

### **Investment Strategies**

IWM's core philosophy is that diversification by employing multiple different management approaches (and managers), in addition to diversification across asset classes, can reduce portfolio risk and volatility. Although we employ what we believe are robust methods to select different strategies and combine them in an optimal manner, there is no assurance to that any combination of investment strategies will be successful in accomplishing that objective.

IWM evaluates historic performance, the types of assets, and the investment methods each manager themselves employ. IWM models are constructed and tested using Riskalyze to attempt to quantitatively optimize return for a particular Risk number. The Risk number represents the projected maximum 6-month loss at a 95% confidence level.

The same allocation approach is employed for individual client portfolios, across multiple client accounts, and are based upon the objectives discussed with the client during consultations. The client may change these objectives at any time.

In certain cases, an Investment Policy Statement that documents the client's objectives and their desired investment strategy is created.

### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. IWM's investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular circumstances. For example, political, economic and social conditions may trigger market events.

**Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

**Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

**Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

**Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

In addition, individual third party-managed investment programs (including those acting as sub-advisors to IWM) may have unique risks which are described in the disclosure information for each program. This information is provided to clients before an investment advisory agreement for that program is executed.

## **VOTING CLIENT SECURITIES**

IWM does not vote proxies on securities. Clients retain the responsibility to vote their own proxies.

# **CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS AND STRATEGISTS**

Neither IWM nor Geneos, the Platform Manager, provide client specific information to portfolio strategists. Portfolio Strategists are only provided limited information so that the strategists are able to confirm the assets under management within their portfolio. In the event we would need to provide additional client information to the portfolio strategists, we will conform to the terms of this client agreement and Regulation S-P.

# CLIENT CONTACT WITH PORTFOLIO MANAGER AND STRATEGISTS

Clients are encouraged to contact and consult with IWM, the overall portfolio manager of the Models and the Program. There is no client contact with the strategists. The strategists provide asset and trade information to IWM and Geneos related to their strategies that we employ in our Models.

## ADDITIONAL INFORMATION

### DISCIPLINARY INFORMATION

Neither the firm nor any of its employees have been involved in legal or disciplinary events related to any past or present investment clients.

### OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Investment Advisory Representatives are also registered representatives of Geneos Wealth Management Inc. Securities are offered through Geneos Wealth Management and registered representatives of Geneos are compensated via commissions and other fees for such business. The compensation method may be different than the IWM advisory fee structure, and to the extent more beneficial to IWM represents a potential conflict of interest. Mr. Pine is also licensed to offer insurance products.

A Geneos Wealth Management platform hosts IWM's Wrap Fee Program, and Geneos receives a portion of the wrap fee for providing platform management services. Geneos has loaned money to Mr. Pine with favorable repayment terms predicated on Mr. Pine maintaining his affiliation with Geneos and maintaining a certain level of client assets on the platform. Mr. Pine is also a shareholder in GWM Holdings, the parent company of Geneos. To the extent that Mr. Pine has a financial incentive to place client assets on the Geneos platform, this represents a conflict of interest.

IWM routinely conducts client events. These events may highlight individual 3<sup>rd</sup> party managers, investments or investment companies, and the highlighted managers or investment companies may contribute funding to help defray the expense of the event. Although the receipt of such funding does not obligate IWM to utilize any manager or investment, this represents a conflict of interest which is disclosed to event attendees. IWM further mitigates this conflict by only accepting funding from managers and investments on which it has already performed due diligence and decided to utilize in client portfolios.

Our financial professionals are paid a salary which reflects their experience, credentials, and the level of client satisfaction they maintain. They receive bonus or ownership compensation based on the growth and profitability of the firm.

## CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

### **Code of Ethics**

The employees of IWM have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Participation or Interest in Client Transactions**

IWM and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Code of Ethics related to participation or interest in client transactions.

### **Personal Trading**

The Chief Compliance Officer (CCO) of IWM is Craig Harting. He reviews all employee trades each quarter. His trades are reviewed by Brent Pine CPA, CFP®. These reviews ensure that the personal trading of employees is not preferential to clients of the firm.

## REVIEW OF ACCOUNTS

### **Progress Review & Update**

Over the course of our relationship, things will change – your goals, life events and health, tax laws, budget needs, and many others. During the Prosperity Plan progress review and update, which may be calendar or event driven, we will re-evaluate your goals, financial picture, risk tolerance, and investment portfolio, revalidating or modifying what we discussed and planned during original discovery and making changes to the strategy if required. In addition to personalized progress reviews, IWM, through Albridge Solutions and Geneos Wealth Management provides “any time” on line access to your entire portfolio, including accounts we do not manage on a discretionary basis. Albridge includes comprehensive performance analytics.

### **Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's personal situation.

### **Trade Confirmations**

Individual trade confirmations and reports of account activity are provided by the custodian or variable annuity product company and are as specified in each advisory contract.

## CLIENT REFERRALS AND OTHER COMPENSATION

### **Referrals to IWM**

IWM has been fortunate to receive many referrals from current clients, employees, personal friends of employees and other financial professionals who are pleased with our service.

IWM may compensate other professionals (persons or companies), including other registered investment advisors for referrals (solicitations). The relationship between the solicitor and IWM is disclosed to the prospective client at the time of the solicitation or referral through a Solicitor's Disclosure Statement that is signed by the prospective client.

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**IWM Referrals to Others**

IWM may refer (solicit) clients to programs and services offered by other professionals (persons or companies), including other registered investment advisors. The relationship between IWM and the prospective client is disclosed to the prospective client at the time of the solicitation or referral through a Solicitor's Disclosure Statement that is signed by the prospective client.

**FINANCIAL INFORMATION**

IWM does not serve as a custodian for client funds or securities. IWM does not require prepayment of fees of more than \$1200 per client, and six months or more in advance.

IWM does have discretionary authority over client funds or securities. There are no financial conditions that are reasonably likely to impair our ability to meet contractual commitments to clients.