

# **Integrated Investment Strategies, Inc.**

**CRD #122706**

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## **Form ADV - Firm Brochure**

### **Item 1**

(Parts 2A and 2B of Form ADV)

July 2024

This brochure provides information about the qualifications and business practices of Integrated Investment Strategies, Inc. If you have any questions about the contents of this brochure, please contact us at: 317-843-5577, or by email at: [daniel@investiis.com](mailto:daniel@investiis.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.

## **Item 2 Material Changes**

In April 2024, Curtis H. Robertson retired from his position as president and sole shareholder of the firm he founded in 1991 – Integrated Investment Strategies, Inc. (“IIS”). He started IIS to provide personalized confidential investment management to individuals, trusts, estates, charitable organizations, and small businesses. A graduate of Indiana University in 1968, he served as president of IIS for almost 35 years and was in the investment and securities industry in various capacities for almost 50 years. Curtis currently holds the title of President Emeritus. For more information on Curtis, please refer to his Supplement as an attachment of this Form ADV Part 2A.

Daniel Lubs, who has been with IIS since 2021 and was soon-after promoted to vice president. In 2023 Daniel assumed the additional responsibilities for day-to-day operations in anticipation of purchasing Curtis’ Class A shares. In April 2024, Daniel become IIS’ new president and sole shareholder. For more information on Daniel, please refer to his Supplement as an attachment of this Form ADV Part 2A.

## **Privacy Policy**

As an IIS client, you have entrusted to our care your personal and financial data. We recognize that your relationship with us is based upon trust, and that you expect us to act responsibly and in your best interest. Because your personal and financial data is your confidential information, we hold ourselves to the highest standards in its safekeeping and use. This means most importantly, that we do not sell client information — whether it is your personal information or the fact that you are an Integrated Investment Strategies, Inc. client — to anyone. Instead, we use your information primarily to provide you with financial advice, to complete transactions that you request, or to make you aware of other services.

## Item 3 Table of Contents

Item 2 Material Changes .....	
Item 3 Table of Contents .....	
Item 4 Advisory Business .....	1
Item 5 Fees and Compensation .....	4
Item 6 Types of Clients and Account Minimums .....	7
Item 7 Investment Strategies and Risk of Loss .....	7
Item 8 Disciplinary Information .....	9
Item 9 Other Financial Industry Activities and Affiliations .....	9
Item 10 Code of Ethics, Participation, or Interest in Client Transactions and Personal Trading .....	9
Item 11 Brokerage Practices .....	9
Item 12 Review of Accounts .....	10
Item 13 Client Referrals and Other Compensation .....	10
Item 14 Custody .....	10
Item 15 Investment Discretion .....	11
Item 16 Voting Client Securities .....	11
Item 17 Financial Information .....	11
Item 18 Business Continuity Plan .....	11
Item 19 Information Security Program .....	12
Brochure Supplements (Part 2B of Form ADV) .....	13

## **Item 4 Advisory Business**

### **Firm Description**

IIS provides investment management to individuals, trusts, estates, charitable organizations, and small businesses. Advice is provided through consultation with the client and may include determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, financial coaching, and estate planning.

IIS is a fee-only investment management firm offering advice through three options of service: Integrated Package, Investment Package, and Financial Planning.

IIS has discretionary authority over its clients' investment portfolios within the guidelines of the investment policy statement. IIS does not sell variable annuities, stocks, bonds, limited partnerships, or security commissioned products. The firm is not affiliated with entities that sell financial products or securities on a commission basis. No security commissions in any form are accepted. Commissions from past insurance fixed products are accepted. No finder's fees are accepted.

IIS does not act as a custodian of client assets. The client always maintains asset control.

IIS may refer or recommend other professionals (e.g., lawyers, accountants, property, and casualty insurance agents, etc.) but are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur. Clients are responsible for fees incurred by their other professional advisors and should perform their own due diligence.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which investment management may be beneficial to the client. An oral evaluation of each client's initial situation is provided to the client.

### **Principal Owners**

Daniel Lubs is a 100% stockholder of Class A (voting shares). Derek M. Robertson is a 100% stockholder of Class B (non-voting) shares.

IIS requires that advisors in its employ have a history of work experience that demonstrates their aptitude for investment management.

## **Types of Advisory Services**

IIS provides investment supervisory services, also known as asset management services; furnishes investment advice through consultations; issues special reports about securities; and issues, charts, graphs, formulas, or other devices which clients may use to evaluate securities.

IIS will assist with the administrative functions necessary in the management of the portfolio, however IIS does not take actual physical possession of any client investments or assets.

The selected custodian or broker/dealer will provide monthly or quarterly statements directly to the Client.

On more than an occasional basis, IIS furnishes advice to clients on matters not involving securities, such as retirement and educational planning matters, taxation issues, and trust services that often include estate planning.

IIS may contract with other firms for administrative services in performing its duties, including trade processing, collection of management fees, record maintenance and report preparation.

As of March 31, 2024, IIS manages approximately \$55.2 Million in assets for approximately 77 clients.

### **A. Investment Package**

Client hires IIS to provide investment advice, supervision, and management of their assets in the accounts previously identified on Schedule A of the Advisory Agreement. IIS will have discretionary authority with full power to determine what securities and other investments will be purchased, sold, retained, or exchanged and what portion will be held in cash equivalent securities, such as money market funds, bank certificates of deposit, U.S. Treasury bills or notes, and other short-term instruments.

### **B. Integrated Package**

The Integrated Package consists of all the features of the Investment Package, plus these additional benefits: institutional funds will be used to provide an academically structured portfolio providing fully diversified investing.

IIS will provide a custom tailored written account statement to the Client at least quarterly which will include: (1) all securities transactions (excluding transactions in short term instruments) made with respect to the portfolio during the preceding reporting period, (2) all Client deposits to or withdrawals from the portfolio, (3) the beginning and ending aggregate values of the portfolio for the period, and (4) a

listing of each investment held in the portfolio. These reports may be in aggregate format, combining assets which may be held in several different accounts at multiple custodians, Directed Trustees, Employer Savings, 401(k) and similar plans and/or broker/dealers, all of which are managed by IIS on behalf of the Client. It is anticipated that this information will also appear in the various custodian, directed trustee, Employer Savings, 401(k), and similar plans and/or broker/dealer statement sent directly to the Client.

### Asset Management

Assets are invested primarily in institutional and retail mutual funds. Retail mutual fund companies charge each fund shareholder an internal investment management fee that is disclosed in the fund prospectus. Initial public offerings (IPOs) are not available through IIS.

### Tailored Relationship

The goals and objectives for each client are documented in our client file management system. Investment policy statements are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

## **C. Financial Planning Strategy Services**

Financial Planning services are optional and are available for all packages. There is no additional charge for these services under the Integrated Package.

If requested by the Client, IIS agrees to conduct a review of the Client's financial situation, which may include a review of assets and liabilities, cash flow, debt management, long-term investment strategies, estate planning documents, insurance, risk management, tax-savings strategies, retirement and long-term care plans, and charitable-giving programs.

### Advisory Service Agreement

Most clients choose to have IIS manage their assets to obtain ongoing in-depth advice. All significant aspects of the client's financial affairs are reviewed. Realistic and agreeable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented by instruction from clients on an ongoing basis.

The scope of work and fee by IIS for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. Not all clients will receive all services offered by IIS.

## Termination of Agreement

A Client may terminate the agreement at any time by notifying IIS in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, IIS would refund any unearned portion of the advance payment.

IIS may terminate the agreement at any time by notifying the client in writing. If the client made an advance payment, IIS would refund any unearned portion of the advance payment. IIS reserves the right to terminate any agreement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate. Any unused portion of fees collected in advance will be refunded within 15 days.

## **Item 5 Fees and Compensation**

For its services, IIS will be paid a quarterly fee, in advance, in accordance with the selected package. IIS will furnish to the Client, (or in the event the Fees are to be paid by the Client's custodian, to the Client's custodian, with a copy to Client), a fee statement for each quarter during which the Adviser performs services hereunder. The fee statement will show the amount of the fee, the value of the Client's assets on which the fee is based, and the specific way the fee was calculated. All brokerage and other transactional costs of the portfolio will be paid by the Client and charged to the portfolio when incurred. The Client, or the Client's custodian as applicable, will pay all fees no later than 30 days following the date of the invoice. The client must consent in advance to direct debiting of their investment account.

### Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are generally small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

IIS, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for the complexity of individual situations.

**PACKAGE SELECTION**

**A. Investment Package** \_\_\_\_\_(Initial)

a. Fees

\$495 New Client Account Setup Fee

**Advisory Fee Breakpoints:**

**Account Advisor Fee**

\$ under \$ 500,000	0.50%
\$ 500,000 but under \$1,000,000	0.40%
\$ 1,000,000 & over	0.35%

b. Customized Quarterly Reporting \_\_\_\_\_(Initial)

i. 0.25% Additional Fee

c. One Year Financial Planning \_\_\_\_\_(Initial)

i. \$1,800 per year

**B. Integrated Package** \_\_\_\_\_(Initial)

a. Fees are locked in once the next breakpoint is reached

**Advisory Fee Breakpoints:**

**Account Advisor Fee**

\$ under \$ 500,000	2.6%
\$ 500,000 but under \$ 750,000	2.4%
\$ 750,000 but under \$1,000,000	2.2%
\$ 1,000,000 but under \$1,250,000	2.0%
\$ 1,250,000 but under \$1,500,000	1.8%
\$ 1,500,000 but under \$1,750,000	1.7%
\$ 1,750,000 but under \$2,000,000	1.6%
\$ 2,000,000 but under \$2,250,000	1.5%
\$ 2,250,000 but under \$2,500,000	1.4%
\$ 2,500,000 but under \$2,750,000	1.3%
\$ 2,750,000 but under \$4,000,000	1.2%
\$ 4,000,000 but under \$6,000,000	1.1%
\$ 6,000,000 over	1.0%

**C. Financial Planning Strategy Package** \_\_\_\_\_(Initial)

a. No assets under management

b. Fees withdrawn as ETF from checking account



**Financial Planning Contracts**

**Financial Planning Fee Per Year\***

1 Year Contract	\$2,400
2 Year Contract	\$2,000
3 Year Contract	\$1,800

\*If a client adds assets under management the contract will convert from the Financial Planning Strategy Package to the Investment Package. Any contract fees of the Financial Planning Strategy Package will be credited toward the Investment Package, One Year Financial Planning.

Current client relationships may exist where the fees are higher or lower than the fee schedule above.

IIS allows for the grouping of portfolio assets for a more favorable billing tier as follows:

1. The account value of “immediate family” (spouse, or equivalent if recognized under local law, and children under the age of 21 may be combined).
2. The account values of paternal or maternal lineage (son and/or daughters) may be combined to determine a grouped portfolio value for billing tier determination. The portfolio grouping will continue to be effective upon the death of the last surviving spouse of the original familial group billing.
3. At the death of the last original spouse of the familial group, each group member’s billing tier will be frozen at the earned group rate. Each portfolio will then become a stand-alone portfolio for tier purposes with the tier rate frozen at the earned group rate as if earned through additional funding, which results in a more favorable rate.

Clients understand the annual fee for assets under management with IIS may be higher than firms providing similar services, but clients may pay additional fees to other firms for financial planning services, which are included in the services provided by IIS, and which are important to a long-term relationship.

Although the Advisory Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client’s and IIS’ discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be refunded on a pro rata basis for the portion of the remaining quarter. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Agreements may not be assigned without clients’ consent.

## Hourly Planning Engagements

IIS provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements varies from \$150 to \$295 depending on the advisor hourly rate.

## Expense Ratios

Mutual funds charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to IIS. Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

## **Item 6 Types of Clients and Account Minimums**

IIS provides investment advice to individuals, trusts, estates, corporations, or business entities. Client relationships vary in scope and length of service.

The minimum account size is \$250,000 of assets under management. IIS has the discretion to waive the account minimum. For certain clients under the minimum account size, the Investment Package will be utilized. Separate fund company fees may apply.

## **Item 7 Investment Strategies and Risk of Loss**

### Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation utilizing an academically focused approach. This means that we use passively managed institutional mutual funds as the core investments and follow the three-factor model to manage the risk level in individual portfolios. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

## Risk of Loss

All investment programs have risks that are borne by the investor. Our investment approach keeps risk in mind. Investors face the following investment risks:

1. **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.
2. **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 underlying circumstances. For example, political, economic, and social conditions may trigger market events.
3. **Inflation Risk:** When 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.
4. **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.
5. **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.
6. **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.
7. **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.
8. **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.

## **Item 8 Disciplinary Information**

In 2018 IIS filed a Consent Agreement with the Indiana Secretary of State Securities Division to pay a \$1500 fine for neglecting to complete and file a required Division online questionnaire.

In 2019 IIS filed a Consent Agreement with the Indiana Secretary of State Securities Division to pay a \$1500 fine for neglecting to submit all Parts of its Form ADV by the required deadline.

## **Item 9 Other Financial Industry Activities and Affiliations**

IIS is Indiana state-registered investment advisor. IIS has no affiliations with broker-dealers, custodians, or other third-party entities. However, Derek M. Robertson, 100% Class B stockholder, is employed by Securities America, which has no affiliation or business transactions with IIS or Daniel Lubs.

## **Item 10 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

The employees of IIS have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

IIS 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 IIS Compliance Manual.

## **Item 11 Brokerage Practices**

### Selecting Brokerage Firms

IIS does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. IIS recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates. IIS recommends Charles Schwab & Co., Inc. as its discount brokerage firm.

### Best Execution

IIS reviews the execution of trades at each custodian each month. The review is documented in the IIS Compliance Manual. Trading fees charged by the custodians are also reviewed on a quarterly basis. IIS does not receive any portion of the trading fees.

### Soft Dollars

IIS does not receive software maintenance credit from Charles Schwab & Company even though some client assets are custodied at Schwab.

### Order Aggregation

Most trades are mutual funds where trade aggregation does not garner any client benefit.

## **Item 12 Review of Accounts**

Daniel Lubs performs regular account reviews. They are performed frequently when market conditions dictate. Other conditions that may trigger a review are changes in the tax laws, new information, and changes in a client's own situation.

Clients receive communications at least quarterly. Investment Management clients receive written quarterly updates. The written updates may include a portfolio statement and a summary of asset allocation plus portfolio performance.

## **Item 13 Client Referrals and Other Compensation**

IIS has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. IIS does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Item 14 Custody**

Qualified custodians hold all assets, and they provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the statements received from their custodians to the report statements provided by IIS.

## **Item 15 Investment Discretion**

IIS does not accept unlimited discretionary authority. IIS accepts limited power of attorney to manage securities accounts within the framework of the clients' investment policy statement. IIS has the limited power of attorney authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

IIS does not receive any portion of the transaction fees paid by the client to the custodian on certain trades.

Limited power of attorney trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing. A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades. Discretionary authority does not include executing documents on the behalf of clients.

## **Item 16 Voting Client Securities**

IIS does not vote proxies on securities. Clients are expected to vote their own proxies. When assistance on voting proxies is requested, IIS will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 17 Financial Information**

IIS does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

## **Item 18 Business Continuity and Succession Plan**

IIS has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services, or key people.

The Business Continuity Plan covers natural disasters such as snowstorms, hurricanes, tornados, and flooding. The Plan covers disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

IIS has a succession plan in place for the incapacitation or untimely passing of Curtis Robertson. Daniel Lubs has been added to the team and will assume responsibility for business and client activities.

## **Item 19 Information Security Program**

IIS maintains an information security program through BitLocker to reduce the risk that your personal and confidential information may be breached. Personal Identification Numbers are required for all electronic devices, and the offices are locked.

## **Brochure Supplement – Form ADV Part 2B**

### **Item 1 Investment Advisor**

**Daniel Lubs, CFP®**  
Born in December 1987  
CRD number is 7032080  
His contact information is 317-843-5779 and  
daniel@investiis.com

### **Item 2 Education Background and Business Experience**

Daniel graduated from Purdue University and serves as President and member of the Board of Directors of IIS. He has prior experience as an insurance agent and financial specialist with Allstate Insurance Company and has an extensive background in engineering, previously holding positions with several companies as Director of Operations, Vice President, Project Manager, and Technical Advisor.

Daniel holds the Certified Financial Planner designation, (“CFP®”), which required examination, experience, and ethics requirements to obtain. Studies for obtaining the designation include general principles of finance and planning in the following areas: financial, insurance, employee benefits, investment and securities, state and federal income taxes, estate tax, gift tax and transfer tax planning, asset protection, retirement, estate, and financial planning consulting. Candidates must also demonstrate experience in the financial planning field, and must complete 30 hours of continuing education, of which two hours must be in ethics.

### **Item 3 Disciplinary Information**

None. There have not been any civil or criminal actions brought against Daniel, nor have there been any administrative proceedings before the state, SEC, or other regulatory authority.

### **Item 4 Other Business Activities**

Daniel is the Treasurer for his homeowners’ association and part owner of Liberty Boatworks LLC, which are not paid positions. He is not actively engaged in any outside business activities that create a conflict



**Item 5**  
**Additional Compensation**

None. Daniel has no sources of compensation related to investment advisory services other than the compensation received by client fees. He does not participate in revenue sharing or soft dollar arrangements with any third-party.

**Item 6**  
**Supervision**

Daniel is responsible for the operations of IIS including monitoring its clients' accounts. The IIS independent compliance consultant, Susan E. Mitchell oversees its compliance program and regulatory compliance requirements. Although Daniel does not "report" to Susan, she will review certain practices within IIS, such as personal transaction reports, regulatory compliance policies and random review of firm activities.

**Item 7**  
**Requirements for State Registered Advisers**

Daniel is registered with the state of Indiana and has passed all the necessary exams to operate as a registered investment advisor representative. With the assistance of his compliance consultant, Daniel will comply with the state's requirements. Daniel has not been the subject of an arbitration claim, has not been found liable in any civil, self-regulatory organization, or administrative proceeding, and has not been the subject of investigation.

## **Brochure Supplement – Form ADV Part 2B**

### **Item 1**

#### **Investment Advisor**

#### **Curtis H. Robertson**

Born in March 1942. CRD number is 401245.

His contact information is 317-843-5779 and  
curt@integratedinvestments.biz.

### **Item 2**

#### **Education Background and Business Experience**

Curtis graduated from Indiana University in 1968. He founded IIS in 1991 and is President Emeritus and member of the Board of Directors. Curtis was president for more than 30 years and has been in the investment and securities business in various capacities for more than 45 years.

### **Item 3**

#### **Disciplinary Information**

None.

### **Item 4**

#### **Other Business Activities**

None.

### **Item 5**

#### **Additional Compensation**

None.

### **Item 6**

#### **Supervision**

Daniel is responsible for the operations of IIS. Independent consultant, Susan E. Mitchell oversees its compliance program and regulatory compliance requirements.

### **Item 7**

#### **Requirements for State Registered Advisers**

Curtis is registered with the state of Indiana and has passed all the necessary exams to operate as a registered investment advisor representative. Through the assistance of his compliance consultant, Curtis will comply with the state's requirements.