

June 22, 2020

Integrity Capital Management, LLC

Form CRS | Client Relationship Summary

INTRODUCTION

Integrity Capital Management, LLC is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about investment advisers, broker-dealers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer investment advisory services to retail investors, including asset management and financial planning. We will meet with you to understand your current financial situation, goals, and risk tolerance. Based on what we learn, we will recommend an investment portfolio to help you meet your stated goals.

Your investment account is monitored weekly by comparing it against the model portfolio designed for the account. We request a review meeting with you every six months to discuss your financial plan and overall situation.

We accept limited discretionary authority over your investments when you become a client. This gives us the authority to buy and/or sell investments to help meet your goals. ICM will not have the authority to withdraw funds or take custody of client funds or securities other than where you have authorized us to deduct investment advisory fees via a qualified custodian.

We offer advice on all widely available mutual funds and exchange traded funds (ETFs) and do not have minimum account sizes. Individual securities may be a part of the portfolio at a client's request; however, ICM will provide no advice on individual securities.

Additional details about services provided can be found in our Form ADV, Part 2A, brochure (Items 4, 8, 13, and 16) at the following link: adviserinfo.sec.gov/firm/summary/142693

WHAT FEES WILL I PAY?

You will be charged an ongoing quarterly fee based on the value of the investments in your account, and the fees are payable in advance each quarter. The fee is calculated based on a tiered schedule but the maximum annual fee is 1%.

Additional details can be found in Form ADV, Part 2A, brochure (Item 5) at the following link: adviserinfo.sec.gov/firm/summary/142693. Since the fee is based on the account value, the more assets there are in your

CONVERSATION STARTER:

ASK YOUR FINANCIAL PROFESSIONAL –

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend for me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

CONVERSATION STARTER:

ASK YOUR FINANCIAL PROFESSIONAL –

- *Help me understand how these fees and costs might affect my investment. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account. In special cases, we may charge an hourly fee for some services.

The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by investment companies and custodians. You may also incur fees from the custodian of the account which could include account maintenance/closing fees, transaction fees, and wire transfer fees. The mutual funds and exchange traded funds (ETFs) also charge internal management fees which are disclosed in the funds' prospectus.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

CONVERSATION STARTER:

ASK YOUR FINANCIAL PROFESSIONAL –

- ➔ *How might your conflicts of interest affect me, and how will you address them?*

Here is an example to help you understand what this means:

We charge you an annual fee based on the value of your account. Since the fee is based on the account value, the more assets that are in your account, the more you will pay in fees, and we will therefore have an incentive to encourage you to increase the assets in your account.

Our compensation comes solely from the advisor fees we receive directly from our clients for the management of their investments.

How do your financial professionals make money?

We do not receive any commissions or indirect compensation of any kind. ICM owners are compensated by the net income of the company. Non-owner investment advisor representatives are paid on a percentage of the revenue generated by clients serviced by them.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research financial professionals.

CONVERSATION STARTER:

ASK YOUR FINANCIAL PROFESSIONAL –

- ➔ *As a financial professional, do you have any disciplinary history? For what type of conduct?*

ADDITIONAL INFORMATION

For additional information about our advisory services or to request a copy of Form ADV Part 3 (Form CRS – Client Relationship Summary) at any time by email at pam.rehart@retirewithicm.com or by phone at 423.230.4500.

CONVERSATION STARTER:

ASK YOUR FINANCIAL PROFESSIONAL –

- ➔ *Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer?*
- ➔ *Who can I talk to if I have concerns about how this person is treating me?*