

# **INTEGRATED RETIREMENT STRATEGIES LLC**

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**22 January 2024**

## **Form ADV, Part 2 Disclosure Brochure**

**SEC CRD #142969**

This Brochure provides information about the qualifications and business practices of **INTEGRATED RETIREMENT STRATEGIES LLC** ["IRS"]. If you have any questions about the contents of this Brochure, please contact us at **(503)327-5592** and/or **dwp.irs@gmail.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.

IRS is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about IRS also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 2 – Material Changes

Integrated Financial Strategies filed its last annual amendment on 28 February 2023. On 20 December 2023 IRS changed its form of organization from Sole Proprietorship to Limited Liability Company (LLC). Since that date, we have made no material changes to this brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting **David W. Peterson** at **(503)327-5592** or **dwp.irs@gmail.com**. Our Brochure is also available on our web site **www.helpmeplan.com**, also free of charge.

Additional information about IRS is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with IRS who are registered, or are required to be registered, as investment adviser representatives of IRS.

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## Item 4 – Advisory Business

**INTEGRATED RETIREMENT STRATEGIES LLC** (“IRS”) has offered financial planning and investment management services to clients since 2007. It operates as a sole proprietorship, 100% owned by David W. Peterson. IRS offers the following services to advisory clients:

### **INVESTMENT SUPERVISORY SERVICES**

IRS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Regular and/or continuous portfolio monitoring

IRS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. IRS requests discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

It should be noted that, because IRS charges fees for its services, there exists a conflict between the interest of IRS and the interests of its clients. IRS will always attempt to assess and then act first in the interests of its clients. No client is ever under any obligation to act upon the recommendation of IRS. Likewise, if any client elects to act on any recommendation from IRS, the client is under no obligation to effect the transaction through IRS.

### **NON-INVESTMENT ADVISORY SERVICES**

**Personal Services** IRS assists clients in organizing their financial resources. IRS will help clients consolidate accounts when necessary and implement personal finance tools like Quicken to manage cash flows, set budgets, and develop goals.

**Financial Planning** IRS evaluates all client resources and earnings potential to estimate a constant standard of living. Then IRS evaluates an overlay of goals and alternative scenarios to illustrate the impact on that standard of living.

**Insurance Review** IRS assists clients as they address their life and disability insurance questions. In the course of preparing financial plans, Mr. Peterson will discuss the costs and

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benefits of life, disability, and health insurance. If appropriate, Mr. Peterson will act as agent for the client in securing such insurance and will earn a commission on such sales.

### **OUR SERVICES ARE TAILORED TO MEET CLIENT NEEDS AND ANY IMPOSED INVESTMENT RESTRICTIONS**

Services provided by IRS are tailored to meet client needs and any imposed investment restrictions, based on a mutually agreed upon Investment Policy Statement. Each investment portfolio is individually designed. Financial planning services are generally delivered upon receipt of a signed client engagement for such services. Planning issues are prioritized and then addressed, either all at one time or over the course of several conferences. Clients meet with their advisor as often as needed to review any changes to the client's financial situation, the investment portfolio upon which advice is provided by IRS, and planning issues.

IRS does not act as custodian of client assets. The client always maintains asset control. IRS places trades for clients under a limited power of attorney. Clients may impose restrictions on investing in certain securities or types of securities. This most often occurs when clients request certain social investing needs be addressed, such as through the use of mutual funds which avoid investments in certain companies. Other restrictions may be imposed by clients with respect to the (average or longest) maturity or credit quality of fixed income investments. Occasionally, certain investments are restricted or prohibited as a condition of the client's professional activities.

### **NON-PARTICIPATION IN WRAP FEE PROGRAMS**

IRS, as a matter of policy and practice, does not sponsor any wrap fee program. A wrap fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisors) and the execution of client transactions.

### **ASSETS UNDER MANAGEMENT**

IRS managed \$34,785,436 in assets for 36 clients as of 28 February 2023. Of this amount, IRS managed \$34,785,436 on a discretionary basis and \$0 on a non-discretionary basis.

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## Item 5 – Fees and Compensation

The specific manner in which fees are charged by IRS is established in a client’s written agreement with IRS. For investment supervisory services, IRS will generally bill its fees in advance on a quarterly basis. Clients may elect to be billed directly for fees or to authorize IRS to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

IRS’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund’s prospectus. Such charges, fees and commissions are exclusive of and in addition to IRS’s fee, and IRS shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that IRS considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions). Clients have the option to purchase products that IRS recommends through other brokers or agents that are not affiliated with IRS.

Fees for investment supervisory services will be based on a percentage of Assets Under Management as follows:

<b>ASSETS UNDER MANAGEMENT</b>	<b>ANNUAL FEE</b>
Under \$2,000,000	1.00%
\$2,000,000+	Negotiable

These fees are negotiable, and the final fee schedule will be attached as Exhibit II of the Investment Advisory Contract with each client. Fees are paid quarterly in advance, and clients may terminate their account with thirty days written notice. Refunds will be given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Clients may terminate their accounts without penalty, for a full refund, within 5 business days of signing the advisory contract. It should be noted that while we believe

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fees imposed by IRS are reasonable, lower fees for comparable services may be available from other sources.

## **INVESTMENT ADVICE NOT INVOLVING SUPERVISION**

**FINANCIAL PLANS** Financial plans and financial planning may include, but are not limited to: life insurance; tax concerns; retirement planning; investment planning; college planning; and debt/credit planning. These services will be based on fixed fees or hourly fees and the final fee structure will be documented in a Letter of Engagement.

**FIXED FEES** Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is \$2,000. Fees may be paid in advance, but never more than six months in advance of delivery of the plan. Fees that are charged in advance may be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable and the final fee schedule will be documented in a Letter of Engagement. Clients may terminate their accounts without penalty, for full refund, within 5 business days of signing the Letter of Engagement.

**HOURLY FEES** Clients may be offered financial planning at an hourly rate for services beyond the scope of their initial financial plan. The hourly fee for these services is \$250. The fees are negotiable and the final fee schedule will be documented in a Letter of Engagement. Fees are paid in arrears. Because fees are charged in arrears, no refund is necessary. Clients may terminate their engagements without penalty, for full refund, within 5 business days of signing the Letter of Engagement.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

IRS does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Item 7 – Types of Clients**

IRS provides portfolio management services primarily to individuals and their families, including high net worth individuals and trusts. Future clients may include corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, and endowments.

IRS does not set any limits on size of investment accounts or client net worth.

### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

IRS provides investment advice on the following types of securities: exchange-listed, over-the-counter, and foreign-issuer securities; corporate debt securities; municipal

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securities; United States government securities; and exchange-traded and mutual fund shares.

IRS uses a combination of technical and fundamental methods to assess risks and opportunities in the capital markets. Fundamental data help us to identify the most appropriate investments in each asset class. Technical data help us identify the supply-demand characteristics of the securities.

Throughout our investment process, we review numerous sources of information: financial newspapers and magazines; inspections of corporate activities; research materials prepared by others; corporate rating services; annual reports, prospectuses, and filings with the SEC; and company press releases.

IRS seeks to invest in securities with a 12+ month time horizon, both to realize preferable tax rates on long-term capital gains and to manage trading expenses. We generally purchase and sell securities as part of a portfolio rebalancing strategy, but we may sell securities that meet our appreciation objectives or experience unfavorable fundamental or technical developments in shorter time spans. Our principal focus is to invest our clients' funds to achieve long-term capital appreciation. However, depending on a client's objectives, income generation may also be a primary focus.

From time to time, and where suitable to client circumstances and preferences, we may use short sales, margin transactions, covered option writing, or option purchases.

Investing in securities involves risk of loss that clients should be prepared to bear.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of IRS or the integrity of our management. IRS has no information applicable to this Item.

### **Item 10 – Other Financial Industry Activities and Affiliations**

#### **OTHER BUSINESS ACTIVITIES**

Mr. Peterson is licensed to sell life and health insurance in the states of Oregon, California, and Washington. In the course of preparing financial plans, Mr. Peterson will discuss the costs and benefits of life, disability, and health insurance. If appropriate, Mr. Peterson will act as agent for the client in securing such insurance, and will earn a commission on such sales. Approximately 10-15 hours/month will be dedicated to the administration of these activities.



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## **OTHER FINANCIAL INDUSTRY AFFILIATIONS**

Mr. Peterson is a licensed insurance agent in the states of Oregon, California, and Washington. From time to time, he will offer clients advice or products from those activities. In 2009, Mr. Peterson was qualified as a Certified Financial Planner™. In 2016, Mr. Peterson further qualified as a Chartered Financial Consultant.

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

IRS has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at IRS must acknowledge the terms of the Code of Ethics annually, or as amended.

IRS anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which IRS, its affiliates and/or clients, directly or indirectly, have a position of interest. Our employees and persons associated with IRS are required to follow our Code of Ethics.

Subject to satisfying this policy and applicable laws, officers, directors and employees of IRS and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for our clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our clients.

In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, to reasonably prevent conflicts of interest between IRS and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with our obligation of best execution. In such

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circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. IRS will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

You have a right to see our Code of Ethics at any time. You may request a copy of the firm's Code of Ethics by contacting David W. Peterson.

It is IRS's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. We will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

#### **Item 12 - Brokerage Practices**

Soft dollar benefits are not limited to those clients who may have generated a particular benefit although certain soft dollar allocations are connected to particular clients or groups of clients. Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

For those client accounts where IRS provides ongoing money management or investment advice with ongoing supervision, IRS will maintain limited power of authority over client accounts with respect to securities to be bought and sold and amount of securities to be bought and sold. All buying and selling of securities will be explained to clients in detail before an advisory relationship has commenced. The Custodian was chosen based on its relatively low transaction fees. IRS will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian. Every attempt will be made to get group discounts on transactions when possible.

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### **Item 13 – Review of Accounts**

The securities in every client's account will be under continuous review. Client accounts will typically be reviewed quarterly. Accounts will be reviewed by Mr. Peterson. Additional reviews may be triggered by material market, economic or political events, or by changes in a client's financial situation. At minimum, each client will receive a quarterly report from the Custodian detailing the client's account activity.

### **Item 14 – Client Referrals and Other Compensation**

No compensation or economic benefit is provided to any IRS employee for client referrals. Similarly, we will not accept sales awards or other prizes for providing investment advice or other advisory services to IRS clients.

### **Item 15 – Custody**

It is our policy to not accept custody of clients' securities. In other words, IRS is not granted access to our clients' accounts, which would enable us to withdraw or transfer or otherwise move funds or cash from any client account to our accounts or the account of any third party (other than for purposes of fee deductions, as explained below). This is for the safety of our clients' assets.

However, with written client consent, IRS may be provided with the authority to seek deduction of its fees from client accounts; this process generally is more efficient for both the client and the investment advisor, and there may be tax benefits for the client to this method when fees can be paid from certain tax-deferred accounts of clients.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. IRS urges the client to carefully review such statements and compare such official custodial records to the account statements that we may provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16 – Investment Discretion**

IRS usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

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When selecting securities and determining amounts, IRS observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to IRS in writing.

### **Item 17 - Voting Client Securities**

IRS will not be required to take any action or render any advice with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the Account may be invested from time to time except as may be directed by the Client and except as may be otherwise required by law.

Clients may obtain a copy of our complete proxy voting policies and procedures upon request. Clients may also obtain information from us about how IRS voted any proxies on behalf of their account(s).

### **Item 18 - Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about their financial condition. If an adviser is registering with one or more of the state securities authorities, the dollar threshold for providing additional information is \$500 in fees per client, collected six months or more in advance by the adviser.

As described in Item 15, at no time does IRS have custody of client funds or securities. Likewise, while a billing for services might exceed \$500, it will only be for one calendar quarter in advance. At no time will IRS bill for services six months or more in advance.

IRS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

### **Item 19 - Requirements for State-Registered Advisers**

Integrated Retirement Strategies LLC is staffed by one investment professional, David W. Peterson, President/Owner. Mr. Peterson draws on over thirty years of financial experience developing personal finance action plans with his clients. Immediately prior to launching IRS, he spent eight months as a registered representative for Park Avenue Securities and two years as an independent investment consultant. For ten years prior to 2005, Mr. Peterson served as Principal and Member of Hangar 4 Partners, LLC, a growth and

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technology hedge fund based in Novato, California. There he worked with investors, helping them understand how growth equities affected their asset allocation and assisting them with tax planning. He also served as Chief Operating Officer of the firm and he was Founder and a Director of the firm's mutual fund for non-U.S. investors.

Prior to Hangar 4, Mr. Peterson worked in a variety of client service, analysis, and research roles in the investment banking and project finance industries. He also has several years experience in a number of corporate finance roles. Mr. Peterson holds a B.S degree in Civil Engineering from Santa Clara University and an MBA from Virginia Polytechnic Institute. He became a CERTIFIED FINANCIAL PLANNER™ practitioner in 2009. CFP® certification is granted to practitioners who have three years minimum experience and have completed a comprehensive course of study at an approved college or university, then passed a two-day examination. In 2016, Mr. Peterson further qualified as a Chartered Financial Consultant. Mr. Peterson holds Oregon, Washington, and California insurance licenses and has passed the FINRA Series 7 and 66 security registration examinations.

**Name:** David W. Peterson

**Born:** 1957

**Education Background:**

Virginia Polytechnic Institute & State University	1981	MBA
Santa Clara University	1979	B.S., Civil Engineering

**Business Background:**

2007-Present	President	Integrated Retirement Strategies LLC
2007-Present	Agent	The Ohio National Insurance Life Insurance Company
2004-2006	Independent Investment Consultant	
1995-2004	Principal/COO	Hangar 4 Partners, LLC

**Professional Designations:**

Certified Financial Planner	2009
Chartered Financial Consultant	2016

**Other Business Activities**

Mr. Peterson is professionally engaged solely by his work at IRS. He is a member of the Financial Planning Association (FPA).

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### **Disciplinary Information**

Mr. Peterson possesses no disciplinary history required to be disclosed by the U.S. Securities and Exchange Commission or the Oregon Department of Consumer and Business Services.

### **Performance-based Fees**

Performance-based compensation may create an incentive for an adviser to recommend investments that may carry a higher degree of risk to the client. As disclosed in Item 6, IRS does not charge any performance-based fees.

### **Arbitration and Civil Judgment**

Neither IRS nor Mr. Peterson has ever been a party to or found liable in an arbitration claim or a civil, self-regulatory organization, or administrative proceeding.

### **Other Relationships and Arrangements**

Other than those outlined in Item 10, neither IRS nor Mr. Peterson has any outside relationships or arrangements within the financial industry. Specifically, Mr. Peterson has no relationship or arrangement with any issuer of securities. Readers of this document have our assurance that all material conflicts of interest which could be reasonably expected to impair the rendering of unbiased and objective advice, are disclosed herein.