Item 1 – Introduction

HighMark Wealth Management, LLC ("HighMark", "we" or "us") is registered with the Securities Exchange Commission ("SEC") as a Registered Investment Adviser ("RIA"). As an RIA, our services and compensation structure differ from that of a registered broker-dealer, 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. The site also provides educational materials about broker-dealers, investment advisers and investing.

Item 2 – Relationships and Services

What investment services and advice can you provide me?

We provide investment advisory services, including discretionary investment management and financial planning and consulting services to individuals, trusts, and estates (our "retail investors"). Our investment management services are generally rendered on a wrap fee basis. When a retail investor engages us to provide investment management services we shall monitor, on a continuous basis, the investments in the accounts over which we have investment authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. Our discretionary authority over your account(s) shall continue until our engagement is terminated.

When a retail investor engages us to provide financial planning and consulting services, we rely upon the information provided for our review and do not verify or monitor any such information while providing this service. Our financial planning and consulting services are completed upon the communication of our recommendations to the retail investor.

We do not limit the scope of our investment advisory services to proprietary products or a limited group or type of investment. We do not generally impose a minimum asset level or minimum annual fee for investment advisory services.

<u>Additional Information</u>: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please see Items 4 and 7, respectively in our ADV Part 2A.

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

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

We provide our investment advisory services on a fee basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our "Wrap Fee"). Our annual Wrap Fee is negotiable and shall generally range from 0.50% to 1.50% of client assets, depending on a number of factors including the amount of assets placed under our management, as well as anticipated future earning capacity, anticipated future additional assets, related accounts, account composition, competition, negotiations with client, and other factors. We typically deduct our Wrap Fee from one or more of your investment accounts, in advance, on a quarterly basis. Because our Wrap Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage. In addition, our Wrap Fee will include most transaction costs and fees to a broker-dealer or bank that has custody of your assets, and therefore may be higher than a typical asset-based advisory fee.

We offer our financial planning and consulting services on a negotiable fixed fee basis, depending on the scope and length of the agreed upon services, or on an hourly basis at hourly rates ranging from \$150 to \$500 per hour. We may require that up to 50% of the total fee be paid in advance.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. For accounts managed outside of our wrap fee program, custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions).

Any such applicable charges will be assessed in accordance with the qualified custodian's transaction fee/brokerage commission fee schedule. Relative to certain mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management fees and other fund expenses). In addition, fees charged by Independent Managers who may be engaged to manage all or a portion of a client's account are separate from, and in addition to, our fees. 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.

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

<u>Additional Information</u>: For more detailed information about our fees and costs related to our management of your account, please see Item 5 in our <u>ADV Part 2A</u>.

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 adviser, 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. Here are some examples to help you understand what this means:

- * Because we pay transaction fees and/or commissions for clients who engage us under our wrap fee program, we have an economic incentive to maximize our compensation by seeking to minimize the number of trades in the client's account.
- * Certain of our representatives, in their separate capacities, are registered representatives of a broker-dealer and/or licensed insurance agents and may recommend commission-based securities and insurance products.
- * We may recommend a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.

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

Additional Information: For more detailed information about our conflicts of interest, please review our ADV Part 2A.

How do your financial professionals make money?

The majority of our financial professionals are compensated on the basis of a percentage of investment advisory fees collected by HighMark. More junior financial professionals are generally compensated on a salary basis, with a bonus component. Financial professionals compensated on a salary basis receive a base compensation package and will receive additional bonus compensation based upon net new assets brought to HighMark or new client relationships established. You should discuss your financial professional's compensation directly with your financial professional.

Item 4 – Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No.

We encourage you to visit <u>www.Investor.gov/CRS</u> to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer at any time to request a current copy of your ADV Part 2A or our *relationship summary*. Our Chief Compliance Officer may be reached by phone: (651)-829-3300.

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