

## Form ADV Part 3: *Relationship Summary*

### AtlasMark Financial, Inc

#### Introduction

AtlasMark Financial, Inc is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professional at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

#### *What Investment Services and Advice Can You Provide Me?*

**Asset Management Services:** We provide asset management services which involves us managing and trading your designated account(s). We will discuss your investment goals and design a strategy to try to achieve your investment goals. We will continuously monitor your account when providing asset management services and contact you at least annually to discuss your portfolio. For more information, please see **Item 4** of our **Form ADV Part 2A**.

**Participant Services:** We provide asset allocation, qualified default investment alternative (QDIA), and pre-designed model portfolio services which involves us managing and trading individual retirement plan participant accounts. This service is provided as part of our Retirement Plan Services offered to participants, employers and sponsors of employee benefit plans.

#### Services

Our services are most commonly provided on a **discretionary** basis which means we will have the authority to determine the type and amount of securities to be bought or sold in your account(s). If we manage accounts on a **non-discretionary basis** it means we will have to confirm any trades in your account(s) with you before we place them. For more information about investment authority, please see **Item 16** of our **Form ADV Part 2A**.

**Limited Investment Offerings:** We do not primarily recommend one type of security to clients. Instead, we recommend investment portfolios designed to be consistent with your specific circumstances and needs. However, we are limited in investment selection in that we can only invest your account(s) in securities which are available on your custodian/broker-dealer's platform. When providing services, we do not recommend or offer advice on any proprietary funds.

**Account & Fee Minimums:** There are no minimum investment amounts or conditions required for establishing an account managed by us.

**Conversation Starters:** *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?*

#### *What Fees Will I Pay?*

#### Fees for Services

**Description of Principal Fees & Costs:** Fees charged for our Asset Management Services are charged based on a percentage of assets under management and don't exceed 2.25% annually, billed in arrears on a monthly basis. Fees are calculated based on the fair market value of your account as of the last business day of the current billing period.

Participant Services are charged to your retirement plan account(s) if the applicable service is elected. The annual fee we charge for this service does not exceed 1.00%. Because our fees are based upon the value of your account(s) and/or plan we have an incentive to recommend that you increase the level of assets in your account(s). When engaging us for services, you will also incur other fees and expenses. For example, the broker-dealer/custodian on your account will charge you transaction fees for executing trades in your account. You will also be charged internal fees and expenses by the funds we invest in within your account.

**Additional Information:** 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. For more information about the fees we charge and the other fees and expenses you will incur, please see **Item 5 of Form ADV Part 2A**.

**Conversation Starters:** 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?

**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?**

**Standard of Conduct:** 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.

(1) When we provide asset management services, we will ask that you establish an account with Fidelity to maintain custody of your assets and to effect trades for your account. Our recommendation to use Fidelity is not based solely on your interest of receiving the best execution possible. We also recommend Fidelity because they provide us with research, products and tools that help us manage and further develop our business operations. As a result, we do not have to pay for such benefits, which save us money; however, these arrangements create a conflict of interest.

(2) Our representatives also serve as licensed insurance agents. When acting in this capacity, the representative will receive commissions for selling insurance products. This creates a conflict of interest when the representative recommends you purchase insurance products through him or her.

(3) We receive expense reimbursement for travel and marketing expenses from distributors of investment and/or insurance products which is a conflict of interest because it creates an incentive to recommend products and investments based on the receipt of this compensation instead of what is in the best interest of our clients.

(4) We are an affiliate of Employee Incentive Plans, Inc., which provides various services to retirement plans. When providing these services, a conflict of interest is created between the affiliated firm due to the common ownership. For more information about these services, please see **Item 10** of our **Form ADV Part 2A**.

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

**Additional Information:** For more information about our conflicts of interests and the ways we are compensated, please see **Item 5**, **Item 10**, and **Item 12** of our **Form ADV Part 2A**.

**How Do Your Financial Professionals Make Money?**

**Description of Salary/Payment of IARs:** We compensate our investment adviser representatives based on the level of assets that the representative brings in to us. This creates a conflict of interest as it gives your representative an incentive to recommend you invest more in your account with us due to the potential for increased payments.

**Do You or Your Financial Professionals Have Legal or Disciplinary History?**

No. Neither us, nor our investment adviser representatives have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

**Conversation Starters:** As a financial professional, do you have any disciplinary history? For what type of conduct?

**Additional Information About AtlasMark Financial**

Additional information about us and a copy of this relationship summary are available on the Internet at <https://atlasmark.com/>. You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/152635>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at (512) 258-4040.

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

**Disciplinary History**

**Additional Information**

**Amended Form ADV Part 3: *Relationship Summary***

**AtlasMark Financial, Inc**  
**Summary of Material Changes Exhibit**

**May 2024**

This is a Summary of Material Changes to our Form ADV Part 3, which describes the material changes since our Form ADV Part 3 was last filed in April 2021. Changes to our Form ADV Part 3 are as follows:

Because the AtlasMark Fund, L.P. was closed and liquidated in 2023, we updated the following section:

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