

## Item 1: Cover Page

# WealthMark LLC Client Brochure

*This brochure provides information about the qualifications and business practices of WealthMark LLC. If you have any questions about the contents of this brochure, please contact us at (360) 734-1323 or by email at: [ben@wealthmarkllc.com](mailto:ben@wealthmarkllc.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.*

*Additional information about WealthMark LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). WealthMark LLC's CRD number is: 144948*

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*Registration does not imply a certain level of skill or training.*

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## **Item 2: Material Changes**

There are no material changes in this brochure from WealthMark LLC's last annual update filing on January 15, 2010. Material changes relate to WealthMark LLC's policies, practices or conflicts of interests only.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

This firm has been in business since June 26, 2007, and the principal owner is Benjamin Arthur Esget.

### B. Types of Advisory Services

WealthMark LLC (hereinafter "WM") offers the following services to advisory clients:

#### *Investment Supervisory Services*

WM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

WM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. WM will request 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.

#### *Referrals*

WM has entered into a fee sharing arrangement with VSH Wealth Management, LLC (VSH), a Washington State registered investment adviser. This relationship will be disclosed in each contract between WM and VSH. The fees shared will not exceed any limit imposed by any regulatory agency.

#### *Services Limited to Specific Types of Investments*

WM limits its money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, REITs, insurance products including annuities, private placements, and government securities. WM may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

WM will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by WM on behalf of the client. WM will not use "model portfolios" but rather a specific set of recommendations for each client based on their personal restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent WM from properly servicing the client account, or if the restrictions would require WM to deviate from its standard suite of services, WM reserves the right to end the relationship.

### **D. Wrap Fee Programs**

WM does not participate in any wrap fee programs.

### **E. Amounts Under Management**

WM has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$35,891,978.98	\$8,235,655.27	08/10/2011

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Investment Supervisory Services Fees*

Total Assets Under Management	Annual Fee
\$1 - \$499,999	1.65%
\$500,000 - \$999,999	1.25%
\$1,000,000 and Above	0.85%

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. There is an annual minimum fee of \$200. Fees are paid quarterly in arrears, and clients may terminate their contracts with written notice.

Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

#### *Referral Fees*

For clients referred by VSH to WM, advisory fees are split evenly for services rendered. This relationship will be disclosed in each contract between WM and VSH. The fees shared will not exceed any limit imposed by any regulatory agency.

### B. Payment of Fees

#### *Payment of Investment Supervisory Fees*

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in arrears.

#### *Payment of Referral Fees*

Referral fees are paid quarterly in arrears.

### C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fee etc.). Those fees are separate and distinct from the fees and expenses charged by WM. Please see Item 12 of this brochure regarding broker/custodian.

## **D. Prepayment of Fees**

WM collects its fees in arrears. It does not collect fees in advance.

## **E. Outside Compensation For the Sale of Securities to Clients**

Neither WM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

### ***1. Clients Have the Option to Purchase Recommended Products From Other Brokers***

Clients always have the option to purchase WM recommended products through other brokers or agents that are not affiliated with WM.

### ***2. Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

WM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

WM generally provides management supervisory services to the following Types of Clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Trusts, Estates, or Charitable Organizations
- ❖ Corporations or Business Entities

### ***Minimum Account Size***

There is no account minimum.



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

### A. Methods of Analysis and Investment Strategies

WM's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

*Charting analysis* involves the use of patterns in performance charts. WM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

*Fundamental analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

*Technical analysis* involves the analysis of past market data; primarily price and volume.

*Cyclical analysis* involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

WM uses Long Term Trading and Short Term Trading strategies.

WM utilizes investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### C. Risks of Specific Securities Utilized

WM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Benjamin Arthur Esget is a registered representative of Matrix Capital Group, Inc.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither WM nor its representatives are registered as a FCM, CPO, or CTA.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Benjamin Arthur Esget is a registered representative of Matrix Capital Group, Inc. WM always acts in the best interest of the client; including the sale of commissionable products to advisory clients.

### **D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections**

WM does not utilize nor select other advisors or third party managers. All assets are managed by WM management.

## **Item 11: Code of Ethics, Participation in Transactions, Personal Trading**

### **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance with Laws and Regulations, Procedures and Reporting, Reporting Violations, and Recordkeeping. Our Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

WM does not recommend that clients buy or sell any security in which a related person to WM has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of WM may buy or sell securities for themselves that they also recommend to clients. WM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of WM may buy or sell securities for themselves at or around the same time as clients. WM will not trade non-mutual fund or non-ETF securities 5 days prior to or 5 days after trading the same security for clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

The custodian, Trust Company of America, was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. WM will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

#### ***1. Research and Other Soft-Dollar Benefits***

There is no minimum client number or dollar number that WM must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for WM to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. The first consideration when recommending broker/dealers to clients is best execution.

#### ***2. Brokerage for Client Referrals***

WM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

WM will not allow clients to direct WM to use a specific broker-dealer to execute transactions. Clients must use WM recommended custodian (broker-dealer). Not all investment advisers require their clients to direct brokerage. By requiring clients to use our specific custodian, WM may be unable to achieve most favorable execution of client transaction and that this may cost clients money over using a lower-cost custodian.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

WM maintains the ability to block trade purchases across accounts but will rarely do so. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed at least monthly only by Benjamin Arthur Esget, Managing Member. Benjamin Arthur Esget is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at WM are assigned to this reviewer.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly a written report detailing the clients account performance, which may come from the custodian.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

WM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to WM clients.

### **B. Compensation to Non –Advisory Personnel for Client Referrals**

WM has entered into a fee sharing arrangement with VSH Wealth Management, LLC (VSH), a Washington State registered investment adviser. This relationship will be disclosed in each contract between WM and VSH. The fees shared will not exceed any limit imposed by any regulatory agency.

## **Item 15: Custody**

WM does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the custodian. Clients will receive account statements from the custodian and should carefully review those statements. Clients are urged to compare statements received from the custodian to invoices received from WM.

## **Item 16: Investment Discretion**

For those client accounts where WM provides ongoing supervision, WM maintains 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 is explained to clients in detail before an advisory relationship has commenced.

## **Item 17: Voting Client Securities (Proxy Voting)**

WM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

WM does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither WM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

Neither WM nor its management have been the subject of a bankruptcy petition in the last ten years.

## **Item 19: REQUIREMENTS FOR STATE REGISTERED ADVISERS**

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

WM currently has only one management person and only one executive officer; Benjamin Arthur Esget. Benjamin Arthur Esget's education and business background can be found on the Supplemental ADV Part 2B form.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Benjamin Arthur Esget's other business activities can be found on the Supplemental ADV Part 2B form.

### **C. How Performance Based Fees are Calculated and Degree of Risk to Clients**

WM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

No management person at WM has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding

### **E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither WM, nor its management persons, has any relationship or arrangement with issuers of securities.