



**DISCLOSURE BROCHURE
(FORM ADV: PART 2A)**

**Summit Wealth Management, LLC
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Dated: March 31, 2011**

This brochure provides information about the qualifications and business practices of Summit Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (205) 776-0100. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about Summit Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Material Changes Summary

This brochure provides prospective clients with information about Summit Wealth Management, LLC that should be considered before or at the time of obtaining our advisory services.

Effective March 31, 2011, the SEC adopted a new form of brochure for registered investment advisers that includes the information previously required in Form ADV Part II. This brochure is required to be updated at least annually, or sooner when material changes to our business take place. The summary below discusses only material changes since our last annual update of this brochure on March 31, 2010.

Each year we will deliver to you, by no later than April 30th, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it.

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Item 4. Advisory Business

Firm Description

Summit Wealth Management, LLC (“Summit” or “SWM”) is a fee-only registered investment advisory firm providing financial planning, investment consulting and asset management services to individuals, businesses and qualified retirement plans.

Principal Owners

Summit is owned by its principal’s, Gerard J. Kassouf, CPA, PFS, CFP®, David P. Kassouf, CPA, PFS, CFP®, Jerry D. Callahan, Jr., CPA and James F. Beall, CPA, PFS, CFP®.

Types of Advisory Services

Wealth Management

Summit is a comprehensive financial advisory firm specializing in investment selection and performance monitoring for individual and institutional investors. Summit employs a wide range of methods to manage portfolios and evaluate investments. Summit uses academic research when making investment decisions. Summit primarily utilizes an investment approach based on Modern Portfolio Theory. Modern Portfolio Theory refers to the process of reducing risk in a portfolio through systematic diversification across asset classes and within those particular asset classes. Summit adheres to the passive style of investing and recommends indexed and passive mutual funds. Summit generally does not recommend individual stocks or bonds in its asset allocation strategies and portfolio recommendations to clients. Keeping client’s investment fees, expenses and taxes under control are a top priority in Summit’s investment strategy.

Financial Planning

Summit provides financial planning for individual clients. The term “financial planning” refers to formulating the client’s financial goals into understandable reports so that the client may then determine which direction the client will take to best utilize available financial resources. The reports generally include information indicating the client’s financial condition, together with planning concepts designed to reduce taxes, protect against interruption of earning capabilities, and investment advice as to methods of obtaining or increasing financial independence, as well as planning for financial circumstances related to premature death. An initial plan is normally prepared for the client and, thereafter, a periodic review is recommended. If the size of the estate changes significantly, Summit may update the client’s plan. Upon request of a client, Summit may provide a limited review of client assets for which we do not have discretionary authority in the context of the overall plan.

Wealth Management with Partners+Program™

Summit offers an asset allocation program through Partners+ Program® sponsored by Capital Directions LLC, an independent investment adviser registered with the Securities Exchange Commission (“SEC”). Through the Partners+Program, Summit provides clients access to diversified portfolios, which make use of passively managed, asset class specific mutual funds that are otherwise available only to institutional investors or through a network of selected investment advisors. Capital Directions, not Summit, provides the day-to-day portfolio management services to the accounts of clients enrolled in the Partners+Program. Summit’s services with respect to such accounts include reviewing the client’s investments to monitor the asset allocation strategy. Summit has limited power of attorney over these accounts in order to view the account balances and transactions. In some circumstances, Summit will have limited power of attorney that will allow them to place trades at the direction of the client. With client’s prior written or oral approval, Summit will direct the investment and reinvestment of the assets in the client’s account, and will monitor the performance of the assets as well as the asset allocation strategy. Summit is available to meet with the client to review quarterly performance reports provided to the client.

ADVISORS ACCESS™ 401k Retirement Plan Services

Summit advises 401k plans through the Advisors Access 401k® program. The program brings the same investment philosophy, managed portfolios and institutional funds used with the firm's individual wealth management clients to 401k participants in a daily-valuation recordkeeping format.

Summit recommends model portfolios comprised of a diverse group of asset-class specific, no-load mutual funds and exchange-traded funds. Plan participants have the option of selecting a model portfolio (All Equity, Growth, Moderate Growth, Conservative or Defensive) or constructing their own customized portfolio of funds.

Advisors Access is sponsored by BAM Advisor Services, LLC ("BAM"), a registered investment adviser that is independently owned and operated. Advisors Access 401(k), through their authorized representative, will enter into separate agreements with both BAM and Summit. BAM constructs and maintains the model portfolios. Plan representatives establish a relationship with an independent qualified recordkeeper on behalf of the Plan. BAM has sole discretion to direct a Plan's recordkeeper to rebalance account balances of the Plan participants to the extent necessary to comply with the current allocation of BAM's model portfolios.

Summit has contracted with BAM Advisors, LLC for Advisors Access™ 401(k) services, including access to model investment portfolios and administrative and marketing support services. BAM receives a portion of the Advisors Access fees paid by participating 401(k) plans.

Client Assets Under Management

Summit provides investment advice to clients on a discretionary basis. As of December 31, 2010 Summit's total assets under management are as follows:

Discretionary Clients = \$71,863,089

Non-Discretionary Clients = \$2,063,482

Total = \$73,927,291

Item 5. Fees and Compensation

Description

Summit is a fee-only financial planning firm, only charging fees based on client assets that we advise, not determining fees by investment performance or gains. Annual fees can be fixed and/or a percentage of assets under management. Annual fee percentages are based on total assets under management and fees are reduced as assets increase. Fees are negotiable and may be waived in certain circumstances.

Summit does not receive any fees from investment sponsors that are commission-based (such as sales charges, brokerage commissions or 12b-1 fees from mutual funds) or performance-based.

Summit's standard form of Client Agreement authorizes Summit automatically to deduct advisory fees directly from the client's account on a quarterly basis. Summit's Client Agreement also provides that we may increase our fees with prior written notice to, but without express written consent of, clients; provided that the client has the right to terminate the Client Agreement before the increased fee takes effect.

Summit's standard fee schedules on an annual basis are as follows:

Financial Planning

Summit may charge a negotiated financial planning fee based upon the number of hours required to prepare the financial plan. Hourly fees range from \$100-\$250, depending on the size of the plan and the complexity of the financial plan. A negotiated fee for a particular financial planning project requested by a client will be billed one-half in advance, with the remaining one-half billed upon completion of the client's financial plan. Fees include preparation and travel time.

Wealth Management

<u>Assets Under Management</u>	<u>Annual Fee as a % of Assets Under Management</u>
\$150,000-\$3,000,000	1.00%
\$3,000,001-\$10,000,000	0.80%
Above \$10,000,000	0.60%

Wealth Management with Partners+Program™

In connection with asset allocation services offered through Capital Directions' Partners+ Program, clients pay an annual management fee for Capital Directions, as well as Summit's services. The fees for the asset allocation services are as follows, with the fee shared between Capital Directions and Summit:

<u>Assets Under Management</u>	<u>Annual Fee as a % of Assets Under Management</u>
\$150,000-\$3,000,000	1.00%
\$3,000,001-\$10,000,000	0.80%
Above \$10,000,000	0.60%

Certain portfolio designs utilize individual fixed income securities in lieu of mutual funds. These designs are generally utilized when the fixed income value exceeds \$3,000,000. Under these arrangements, the fee shared between Capital Directions and Summit is:

<u>Fixed Income Under Management</u>	<u>Annual Fee as a % of Assets Under Management</u>
Fixed Income<\$3,000,000 (first \$3million)	0.50%
Fixed Income>\$3,000,000 (amount over \$3million)	0.40%

ADVISORS ACCESS™ 401k

<u>Assets Under Management</u>	<u>Annual Fee as a % of Assets Under Management</u>
On the first \$1,000,000	1.00%
On the next \$1,000,000	0.75%
On the next \$3,000,000	0.55%
On the next \$5,000,000	0.40%
On all amounts thereafter	0.35%

The above fee schedule does not include management fees and expenses of underlying funds, or any brokerage commissions, custodial or recordkeeping fees or other expenses incurred by the Plan and/or its participants in connection with investment and/or administration of the Plan. Summit is entitled to receive 70% and BAM is

entitled to receive 30% of the fees paid by a Plan according to the above fee schedule. The percentage of fees paid to BAM and Summit may vary from time to time based upon their written agreement.

Fee Billing

Fees are billed quarterly in arrears or in advance, as agreed upon by the client, based on assets under management as of the date an account is opened and, thereafter, generally as of the last business day of the prior calendar quarter (although another business day close to the end of the quarter may be selected by Summit as the valuation date in its discretion). Client will receive directly from its custodian monthly account statements that indicate all fees deducted from the account. It is the client's responsibility to review fee calculations, as client's custodian will not. Fees are negotiable and may be waived in certain circumstances, such as for accounts maintained by Summit's employees and their related persons.

Other Fees and Expenses

Management fees charged are separate and distinct from the fees and expenses charged by mutual funds which may be recommended to clients. A description of these and other expenses are available in each fund's prospectus. Client's custodian and executing broker-dealer charge custodial, transaction and other services fees. These fees and rates are not determined or established by Summit and Summit does not receive any compensation from any custodian, broker-dealer or investment sponsor.

Refund upon Termination of Advisory Agreement

Clients may terminate their investment advisory agreement with Summit at any time upon written notice without the imposition of any penalty. The client will be billed for costs incurred up to the date of termination. Summit will refund the pro rata, unearned portion of the advisory fees paid to Summit. Clients will receive full refunds should they terminate the agreement within five business days of signing with Summit.

Item 6. Performance Based Fees

Summit does not charge any performance based fees.

Item 7. Types of Clients

We provide financial planning, advisory services and investment management to individual and institutional clients such as pension or profit sharing plans, trusts, estates, and charitable organizations. Client accounts in the Partners+Program through Capital Directions are subject to a minimum asset based requirement of \$150,000 and a minimum annual fee of \$2,000. The fees and minimum account values are negotiable and may be waived in certain circumstances.

Item 8. Method of Analysis, Investment Strategies and Risk of Loss

Modern Portfolio Theory

Summit employs a wide range of methods to manage portfolios and evaluate investments. Summit uses academic research when making investment decisions. Summit primarily utilized an investment approach based on Modern Portfolio Theory. Modern Portfolio Theory refers to the process of reducing risk in a portfolio through systematic diversification across asset classes and within those particular asset classes. Summit adheres to the passive style of investing and, thus, recommends indexed and passive mutual funds. Summit generally does not recommend individual stocks or bonds in its asset allocation strategies and portfolio

recommendations to clients. Keeping client's investment fees, expenses and taxes under control are a top priority in Summit's investment strategy.

For the Capital Direction clients, Summit provides access to diversified portfolios, which make use of passively managed, asset class mutual funds that are available only to institutional investors and clients of a network of carefully selected investment advisors.

For the clients not participating in the Capital Directions program, risk tolerance and asset allocation are reviewed and the client is provided with an array of retail mutual funds.

We believe in diversified asset class exposure obtained primarily through a diversified mix of low cost mutual funds that represent desired asset classes. Mutual funds and exchange-traded funds (ETFs) recommended by Summit typically invest in some or all of the following types securities:

- U.S. Stocks (Small-, Mid- or Large-Capitalization)
- Foreign Stocks, including Emerging Markets
- Investment Grade Fixed Income Securities
- Non-Investment Grade Fixed Income Securities
- Tax-Exempt Municipal Bonds
- U.S. Government and Government Agency Securities
- Derivatives
- Real Estate Investment Trusts (Domestic and Foreign)

Sources of Information

The main sources of information utilized by Summit in making its investment decisions are financial newspapers and magazines, research materials, corporate rating services and annual reports, prospectuses and other SEC filings. Through these sources and the client's goals and objectives, Summit will determine what type of investments and investment strategies to recommend to clients.

Principal Investment Strategies

Asset allocation models and specific funds recommended to clients typically are set forth in the client's Investment Policy Statement. Summit primarily recommends low cost mutual funds for the reason that mutual funds can provide a diversified portfolio that is designed to limit the impact of large fluctuations in values of individual stocks and bonds. Mutual funds do not offer protection from market volatility. At times, different funds may be recommended to improve client portfolios. Summit generally invests for the long-term and does not engage in short-term market timing.

Summit typically recommends mutual funds and ETFs to implement its recommended investment strategies. However, Summit also may recommend exchange-listed stocks; investment grade corporate bonds and other debt securities, municipal securities and U.S. Government Securities, depending upon the particular client's existing portfolio and investment objectives. Summit generally does not recommend individual stocks or bonds, but certain exceptions may be made in cases where the stocks were obtained before becoming a client or are requested by the client. Summit will monitor individual stock exposure in the overall portfolio only upon written agreement with the client.

We may give advice and take action with respect to other clients that is different from the advice, timing, and nature of action taken with respect to your account. Timing, allocation, and types of investments are determined as part of each client's overall financial plan.

Principal Investment Risks

Summit's primary goal for investing is to help the client maintain purchasing power over the long term. This may result in short term variability and loss of principal. Time horizon and risk tolerance are key determinates of the proper asset allocation. Our approach focuses on taking appropriate risks for which clients are compensated (i.e. market risk) and seeking to limit or eliminate risks that do not provide compensation over the long term (i.e. individual stock risk).

Investing in securities involves risk of loss that clients should be prepared to bear. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. Summit cannot guarantee that it will achieve a client's investment objective. Below are some of the more specific risks of investing:

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client's invest.

Market Risk. The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the client or an underlying fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

Management Risk. Summit's investment approach may fail to produce the intended results. If our perception of the performance of a specific asset class or underlying fund is not realized in the expected time frame, the overall performance of client's portfolio may suffer.

Equity Risk. Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies.

Fixed Income Risk. The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

Municipal Securities Risk. The value of municipal obligations can fluctuate over time, and may be affected by adverse political, legislative and tax changes, as well as by financial developments that affect the municipal issuers. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water and sewer projects, etc.), conditions in the sector related to the project can affect the

overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues; revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over-the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market (the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

REIT Risk. To the extent that a client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.

Derivatives Risk. Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Derivative investments by mutual funds or ETFs in which the client invests involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that it may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.

Foreign Securities Risk. Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

Item 9. Disciplinary Information

Summit and its principals have no material legal or disciplinary events to report.

Item 10. Other Financial Industry Activities and Affiliations

Associated persons of Summit are CPA's affiliated with L. Paul Kassouf & Co., P.C., an accounting and consulting firm providing audit, compliance, and tax consulting services to clients. Associated persons of Summit spend approximately 70% of their time providing advice to clients of the accounting firm and 20% of their time providing investment advice.

Capital Directions is an investment adviser registered with the SEC under the Investment Advisers Act. Capital Directions' Partners+ Program provides a full array of quality investment management services to Summit and its clients. The program also offers back-office support in the form of quarterly performance reports to clients, risk/return assessments, investment policy statements, and client service agreements which provide a clear, written description of the advisory relationship between Summit and its clients.

Associated persons of Summit are affiliated with L. Paul Kassouf & Co., P.C., an accounting firm, and Administrative Services, LLC, a pension plan administrator and consultant. Associated persons spend approximately 10% of their time determining effective plan design, preparing and coordinating plan documents, communicating plan benefits to employees and recordkeeping services to retirement plans.

Item 11. Code of Ethics, Interest in Client Transactions and Personal Trading

Code of Ethics

Summit has adopted a Code of Ethics pursuant to Rule 204A-1 under the Investment Advisers Act of 1940 which, among other things, governs the personal trading activities of Summit's investment advisory representatives. The Code of Ethics is based on the principle that Summit and its employees owe a fiduciary duty to clients. As a brief summary, the Code of Ethics requires all advisory personnel to avoid activities or interests that might interfere with making decisions in the best interests of clients. In addition, unless they qualify for an exemption, advisory personnel are required to submit quarterly reports of their personal securities transactions to Summit's Chief Compliance Officer for review. An exemption is available under the Code of Ethics for advisory personnel that effect their personal securities transaction through an approved broker that submits statements to Summit. In addition, each person subject to the Code of Ethics is required to report all violations of which such person becomes aware to the Chief Compliance Officer. Summit will provide a copy of its Code of Ethics, free of charge, upon the written or oral request of any client.

Participation or Interest in Client Transactions

Adviser generally does not recommend investments to clients in which Adviser or any of its principals has a financial interest. If any such investment were proposed, the principal would be required to disclose any participation or interest in the transaction to the client in advance.

Personal Trading

From time to time, Summit's advisory representatives may purchase securities for their personal accounts that they also recommend to clients. In such cases, Summit's representatives will not effect transactions for their personal accounts that are contrary to recommendations made to clients. Further, Summit's representatives will not compete with clients in connection with such transactions. Summit has an Insider Trading Policy that prohibits its representatives from trading on non-public information.

Item 12. Brokerage Practices

Recommending Brokerage Firms

Summit typically recommends Charles Schwab & Co., Inc. or Fidelity Brokerage Services, LLC to serve as custodian of clients' assets and to execute trades in clients' accounts. Summit typically recommends Fidelity Brokerage Services, LLC and TD Ameritrade to serve as custodian and broker of record for its retirement plan clients.

The selection of the broker-dealer through which a client's investment strategy or other investment advice is implemented is solely at the discretion of each client. Typically, all mutual fund securities transactions engaged in through Summit will be affected through client's custodial broker-dealer (typically Schwab or Fidelity). The

commission rates charged to effect such transactions are established by the executing broker-dealer. Based upon its own knowledge of the securities industry and discussions with Schwab, Fidelity and TDAmeritrade, Summit believes that such commission rates are competitive within the securities industry.

Summit recommends these brokerage firms based on their low mutual fund transaction fees, execution capabilities, financial stability, good administrative capability, accurate communications/settlement processing, and corporate culture. These broker-dealers charge each client a commission or fee to execute transactions. Summit does not negotiate the commission rates or fees charged to clients. While Summit believes the commissions and fees charged by Schwab and Fidelity are competitive, transactions may not always be executed at the lowest available commission rate.

Although Summit routinely requests that clients direct Summit to execute all transactions through Schwab, Fidelity or TDAmeritrade, clients may direct the use of another qualified custodian or broker-dealer.

Best Execution

As a fiduciary, Summit has an obligation to obtain best execution of advisory clients' transactions under the circumstances of the particular transaction. Summit seeks to execute client transactions in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances. Summit has evaluated the full range of brokerage services offered by Schwab and Fidelity and has determined that they have reliable execution capabilities, compared to other comparable brokers. Based on these factors, Summit believes that these broker-dealers provide the best price and execution to Summit's clients compared to other broker-dealers that offer institutional advisory platforms. If client establishes a brokerage/custodial account with Schwab or Fidelity, then Summit will place all orders pursuant to its investment determinations on behalf of client's portfolio through that entity, even though client potentially could obtain a more favorable net price and execution from broker-dealer in particular transactions or from a discount broker in general. While we believe commissions and fees charged by Schwab and Fidelity are competitive, transactions may not always be executed at the lowest available commission rate.

Conflicts of Interest

Summit recommends that clients custody their assets and execute brokerage transactions through Schwab or Fidelity. While there is no direct linkage between the investment advice given, Summit receives economic benefits from recommending these custodians. Benefits include: (i) receipt of duplicate client confirmations and bundled duplicate statements and ability to have investment advisory fees deducted directly from client accounts; (ii) receipt of compliance publications; (iii) access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors; (iv) access to an electronic communication network for client order entry and account information; and (v) discounts on services offered by the broker-dealer and its affiliates, such as web site constructions and maintenance.

Soft Dollars

Summit does not enter into so-called "soft dollar arrangements," where Summit directs client commissions to a broker-dealer that provides research and brokerage services to Summit.

Order Aggregation

Summit typically recommends mutual funds, which are purchased and sold for a transaction fee charged by the client's executing broker-dealer. Summit does not "block" or aggregate client trades, because the trades are executed for a flat fee per fund trade basis and blocking client trades would not result in the reduction of such fees.

Summit does not block client trades, or aggregate securities transactions and then allocate the appropriate shares to client account at the custodial level.

Item 13. Review of Accounts

Accounts are monitored at regular intervals and reviewed annually, at a minimum, by the associated persons of Summit. There is no minimum number of accounts assigned to a reviewer. The review process covers each of the following elements:

- A. Review of the client's Investment Policy Statement;
- B. Review of the client's risk profile; and
- C. Recommend rebalancing client's portfolio if needed.

More frequent account reviews may be triggered by any one or more of the following events:

- A. Client's specific request;
- B. Change in client's investment objectives, risk and return characteristics; and
- C. Recommend rebalancing client's portfolio if needed.

Clients in the Partners+ Program will receive quarterly performance reports, prepared by Capital Directions, which summarize the clients' asset management account performance. Clients not in the Partners+ Program will receive quarterly performance reports prepared by Summit Wealth Management. The clients will also receive monthly statements from Schwab Institutional, which outline the clients' current securities positions and current market value of the client's portfolio.

Item 14. Client Referrals and Other Compensation

Incoming Referrals

Summit encourages and promotes referrals of clients to our advisory firm. We do not, but may in the future, compensate people or firms for providing referrals.

Referrals of Other Professionals

Summit will refer clients to other service professionals if requested or deemed necessary, based on the specific needs of the client. For example, Summit may refer clients to legal counsel and insurance agents. It is possible that these professionals may, in turn, make referrals of their clients seeking investment advice to Summit.

Other Compensation

Summit does not receive sales charges, commissions, service fees, 12b-1 fees or other compensation from a non-client in connection with providing investment advice to a client.

Item 15. Custody

Summit does not maintain physical custody of client assets, which are held by the independent qualified custodian selected by the client. All checks deposited into client's custodial accounts must be made payable either to the custodian or for the benefit of the account name. Summit may be deemed to have custody of client assets if it has the authority to deduct its fees from the client's custodial account. Clients will receive monthly account statements from their custodian. Clients should review their account statements carefully.

Item 16. Investment Discretion

Discretionary Trading Authority

Summit primarily provides investment advice on a discretionary basis to certain clients. In such cases, the client and Summit execute an investment advisory agreement wherein the client grants to Summit discretionary authority to act on the client's behalf for the limited purpose of buying, selling and trading securities and all actions necessary or incident to such activities. Clients may impose reasonable restrictions or limitations Summit's investment discretion. Clients are contacted at least annually to determine whether there are any changes to their financial circumstances or restrictions they wish to impose.

Limited Power of Attorney

Clients typically grant Capital Directions or Summit Wealth Management a limited power of attorney for trading purposes only over their custodial account to allow Capital Directions to place trades or rebalance the client's accounts as directed by Summit.

Trade Errors

Trades are reviewed by Summit's Chief Compliance Officer, to ensure that trade execution is consistent with instructions given to the executing broker-dealer. On occasion, an error may be made in executing a trade. For example, a security may be purchased (instead of sold) or the wrong number of shares may be purchased (or sold). In these situations, Summit seeks to rectify the error by placing the client account in the same position as it would have been had there been no error. Clients will not recognize any net loss due to a transaction error by Summit. The client will be made whole as soon as possible upon discovery of the error and all errors will be reviewed and documented accordingly.

Item 17. Voting Client Securities

It is currently Summit's policy not to exercise proxy voting authority over client securities. Each client retains proxy voting authority over the securities that are held in the client's account. Summit will promptly forward to the client all proxy solicitation notices received by Summit, if any, that relate to securities held in a client's account. The client may thereafter, in the client's sole discretion and at the client's sole expense, decide how to vote such proxies.

For clients owning shares of mutual funds recommended by Summit, the mutual fund's portfolio manager will vote, on the clients' behalf, proxies of companies owned by the mutual fund. Clients may obtain a copy of a mutual fund's proxy voting policies online through its web site or by reviewing fund documents filed with the SEC at www.sec.gov.

Item 18. Financial Information

We are capitalized in compliance with applicable regulations and are not aware of any financial conditions that are reasonably likely to impair the fulfillment of our contractual commitments to our clients.

Miscellaneous

Business Continuity Plan

Summit has adopted a business continuity plan that governs how its operations will be conducted in the case of an internal or external significant business disruption. In the case of a significant business disruption that affects communication with or to Summit's main offices, clients are urged to call Gerard Kassouf, Summit's Managing Member, at (205) 871-0090 or (205) 999-2397, or Jerry Callahan, Summit's Chief Compliance Officer, at (205) 837-1889 for any and all questions that they may have with respect to their account. A copy of the Summit's business continuity plan will be made available to any client upon written request.

Appendix 1 - Privacy Policy

PRIVACY NOTICE TO OUR CLIENTS

Summit Wealth Management, LLC a registered investment adviser, is providing you with this information as required by Regulation S-P adopted by the Securities and Exchange Commission.

INFORMATION ABOUT YOU THAT WE COLLECT

We collect non-public personal information about you from the following sources: information we receive from you in preparing financial plans or completing mutual fund applications or other forms and information about your financial transactions with us, our affiliates, or others.

OUR USE OF INFORMATION ABOUT YOU.

As permitted by law, we may disclose some or all of the information we collect to independent parties that service your account in order to provide services that you request. These service providers may include broker-dealers, third-party investment managers, banks, and security clearing agencies; and others who provide services to us, such as parties who provide technical support for our systems and our legal and accounting professionals, as well as government agencies and other parties as permitted by law.

WE RESPECT YOUR PRIVACY

It is our policy to treat customer information in a secure and confidential manner. We do not sell customer information. We do not provide customer information for marketing purposes to anyone outside of Summit Wealth Management, LLC. We may, however, be required to disclose client financial information to outside service providers in compliance with applicable laws. Even if you decide to close your account(s) or become an inactive client, we will adhere to the privacy policy described above.

HOW WE PROTECT YOUR CONFIDENTIAL INFORMATION

We restrict access to non-public personal information about you to those employees of Summit Wealth Management who need that information to provide investment services to you, or to employees who assist those who provide those services to you. We maintain physical, electronic and procedural safeguards to protect your non-public personal information.

DISPOSAL OF INFORMATION

We have taken steps to reasonably ensure that the privacy of your non-public personal information is maintained at all times, including in connection with the disposal of information that we are no longer required to be maintain. Such steps shall include whenever possible, shredding paper documents and records prior to disposal, requiring off-site storage vendors to shred documents maintained in such locations prior to disposal, and erasing and/or obliterating any data contained on electronic media in such a manner that the information can no longer be read or reconstructed.