

FORM ADV**Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

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Hours per response.....9.402

Name of Investment Adviser:						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:

**This part of FORM ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any government authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.

Applicant:

SEC File Number:

Date:

801-

1. A. Advisory Services and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- | | | |
|------------------------------|--|---------|
| <input type="checkbox"/> (1) | Provides investment supervisory services | _____ % |
| <input type="checkbox"/> (2) | Manages investment advisory accounts not involving investment supervisory services..... | _____ % |
| <input type="checkbox"/> (3) | Furnishes investment advice through consultations not included in either service described above... | _____ % |
| <input type="checkbox"/> (4) | Issues periodicals about securities by subscription | _____ % |
| <input type="checkbox"/> (5) | Issues special reports about securities not included in any service described above..... | _____ % |
| <input type="checkbox"/> (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... | _____ % |
| <input type="checkbox"/> (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities... | _____ % |
| <input type="checkbox"/> (8) | Provides a timing service | _____ % |
| <input type="checkbox"/> (9) | Furnishes advice about securities in any manner not described above..... | _____ % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- | | | |
|--|------------------------------|-----------------------------|
| B. Does applicant call any of the services it checked above financial planning or some similar term? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|

C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | |
|--|---|
| <input type="checkbox"/> A. Individuals | <input type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

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Applicant:

SEC File Number:
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Date:

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|---|---|
| <input type="checkbox"/> A. Equity securities | <input type="checkbox"/> H. United States government securities |
| <input type="checkbox"/> (1) exchange-listed securities | <input type="checkbox"/> I. Options contracts on: |
| <input type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> (1) securities |
| <input type="checkbox"/> (3) Foreign issuers | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities: | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|--|--|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|--|---|
| (1) <input type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission |
| (4) <input type="checkbox"/> Corporate rating services | (7) <input type="checkbox"/> Company press releases |
| | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|---|--|
| (1) <input type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

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Applicant:

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Date:

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
☐ ☐

(If yes, please describe these standards on Schedule F)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- ☐ C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.. Yes No
☐ ☐

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

Applicant:

SEC File Number:
801-

Date:

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☐ E. Buys or sell for itself securities it also recommended to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes No
☐ ☐

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory account, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.
- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Applicant:

SEC File Number:
801-

Date:

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | | |
|--|--------------------------|--------------------------|
| | Yes | No |
| (1) securities to be bought or sold? | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of securities to be bought or sold? | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | <input type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ☐ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|--------------------------|--------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes | No |
| | <input type="checkbox"/> | <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes | No |
| | <input type="checkbox"/> | <input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?..... ☐ Yes ☐ No

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part**

Applicant:
Summit Equities, Inc.

SEC File Number:
801-39161

Date:
3/31/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

IRS Empl. Ident. No.:

Item of Form (identify)	Answer
Part II 1D	<p>Services provided, fees, terminations, and refunds: 1A (1) Investment Supervisory Services are provided to our clients wherein we place Mutual Funds and partnerships trades and supervise these trades through the confirmations we receive to ascertain that the investments are properly executed for the benefit of our clients. Periodically, these investments may be reviewed to ensure continued suitability for the client(s). Summit Equities, Inc. receives as its fee the stated commissions as per the sales prospectus of the products that are implemented. Refunds are not applicable to a loaded mutual fund transaction.</p> <p>On mutual funds that do not pay brokerage commissions, Summit Equities, Inc. may charge a fee up to but not in excess of 2%, which is negotiable, to originate the account. Generally, after the first year, a .25% asset fee will be charged for the annual administration and servicing of the account. The client has the right to terminate the contract without penalty within five (5) business days. If the client terminates the contract after five business days, the origination fee is not refundable. If the client terminates the contract after the first anniversary, the current yearly fee of .25% is not refundable.</p> <p>On investments products or services that do not pay commissions, Summit Equities may charge a fee, not in excess of 2%, to originate or monitor the account. The client has the right to terminate the contract without penalty within five (5) business days after entering into the contract. In the event the client terminates the contract after five (5) business days, the fee is not refundable.</p> <p>Summit Equities provides a program of strategic asset allocation and diversification based upon the stated objectives and risk tolerances of a client. Summit Equities will assist the client to position his/her investments in accordance with the agreed upon allocation, using investment vehicles such as managed mutual funds, variable annuities, variable life contracts, and portfolios of individual issues. On a periodic basis, the client's portfolio will be reviewed. In this program, Summit Equities can provide management for a client portfolio on which it is not the broker of record. The maximum annual fee for this Strategic Asset Allocation is 1.5% annually of the total funds managed and is paid in advance. For renewal accounts, the bill will be based upon the account values as of either the most recent calendar quarter or a more recent month end prior to the renewal date. The client has the right to terminate the contract without penalty within five (5) business days after entering into the contract. In the event of termination after five business days, a non-refundable administrative fee of \$100 for each managed account will be charged and will be retained by the manager. The balance of the fee paid for each management contract will be refunded on a monthly pro-rated basis. The procedure applies to both annual and quarterly fee payments. Fees paid on a monthly basis are not refundable.</p> <p>1A (2) Summit Equities, Inc. may, at the client's request, place trades without a total review of the client's portfolio. These trades are executed for existing clients only. Summit Equities, Inc. charges the cost for clearing such trades plus a fraction, which is negotiable, which is designed to be lower than that which national discount brokerage firms charge. Refunds of trade charges are not applicable.</p> <p>Summit Equities may recommend a program of Model Portfolios of Mutual funds and individual stock issues that are held in street name National Financial Services, a clearing agent for Summit Equities and a member of the New York Stock Exchange. The fees for the Model Portfolios range from 1.25% to 1.9%, depending on the total amount invested and are paid in advance. For the individual stock portfolios, there are additional charges for the buy/sell tickets which will range from between 0.2% and 1.2%. The client has a right to terminate the contract without penalty within five (5) business days, a nonrefundable administrative fee of \$100 for each managed account will be charged (\$250 for the individual securities portfolios) and will be retained by the manager to offset the ticket charges paid by the manager to set up and then liquidate the portfolio. The balance of the fee paid for each management contract will then be refunded on a monthly pro-rated basis. Fees paid on a monthly basis are not refundable.</p> <p>Summit Equities may recommend other Investment Advisers as providers of investment management services for clients. Generally, a minimum account of \$100,000-\$250,000 is required for these services. Summit Equities receives a portion of the fees received by the referred Investment Adviser for its investment management services. These fees are outlined in the referred Investment Adviser's Form ADV and in the contract with the client. Clients who terminate their contract for these services with the referred Investment Advisers are entitled to and receive a pro-rata refund.</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Summit Equities, Inc.

SEC File Number:
801-39162

Date:
3/31/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

IRS Empl. Ident. No.:

Item of Form (identify)	Answer
	<p>1A (7) Summit Equities, Inc. may provide planning in any one or more of the following areas: tax, investment, estate, pension, and profit sharing, business, insurance and cash flow management. All arrangements concerning planning fees, which are negotiable, will be memorialized in a written contract which will be kept on file at least three years. It is estimated that the fees for planning services will, in general, range from approximately \$4000 to \$50,000, depending on the complexity. Fees are generally payable in full at the inception of the planning process. Any client who is not satisfied with the financial plan may receive a full refund within ten (10) days of receipt of the plan. However, the plan must be returned to receive the refund.</p> <p>1A (8) Summit Equities, Inc. may provide tactical asset allocation services for clients in an investment program using a defensive and one or more aggressive mutual funds. Summit Equities, Inc. charges an annual fee ranging from 1.3% to 1.9% depending on the portfolio model selected by the client. In addition, there is a \$100 administrative retainer fee payable annually. The fees are generally due at the inception of the contract. Summit Equities may offer clients a quarterly payment schedule for management fees. The client has a right to terminate the contract without penalty with five (5) business days after entering into the contract. If the client terminates the contract after five business days, a non-refundable administrative fee of \$100 for each managed account will be charged and will be retained by the manager. The balance of the fee paid for each management contract will be refunded on a monthly pro-rated basis. The procedure applies to both annual and quarterly fee payments. Summit Equities shall in certain limited situations be permitted to adjust the fee by an amount not to exceed the listed schedule in the agreement. Fees paid on a monthly basis are not refundable.</p> <p>The management fee for assets in Mutual fund shares is for active management asset allocation with respect to those shares and is separate and distinct from and in addition to the fees and expenses charged by the mutual fund companies in which client assets are invested to all the shareholders of such mutual funds. A description of such fees and expenses is available in each mutual fund's prospectus.</p>
Part II 3K	Other types of investments: primarily leasing, and oil & gas.
Part II 4C	Other: We provide investment services by (1) moving client funds between a money market fund and one or more mutual funds within the fund family; (2) moving client funds within one fund family or to switch fund groups to another group in which the client has an account; (3) moving client funds between investment choices within a variable annuity account or a variable life contract; or (4) managing a Model Portfolio of Mutual funds or individual stock issues for a client.
Part II 5	The General standards of education and business background which the applicant requires for persons associated with the applicant are either a college degree or a minimum of two years of business experience or equivalent training provided by the applicant or another qualified source.

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Summit Equities, Inc.

SEC File Number:
801-39162

Date:
3/31/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

IRS Empl. Ident. No.:

Item of Form (identify)	Answer
Part 11 6	<p>The Professional Standards/Investment Committee members include Steven Weinman, Rembert D. McNeer, Joseph F. Rowek, David Porro, Brian D. Loreti and Michael Mirone. Their business experience and credentials are listed below.</p> <p><u>Steven Weinman, CPA, MBA, APC - Estate and Income Tax, Business Structuring</u></p> <p>Education: New York University Graduate School of Business, MBA Finance New York University Graduate School of Business, APC Tax Program Fairleigh Dickinson University, BS Accounting</p> <p>Business Experience 11/1982 – To Present: Chairman, Summit Financial Resources, Inc. President, T.R. Winston and Company Coopers and Lybrand</p> <p><u>Rembert D. McNeer, J.D., CPA- Estate and Income Tax, Business Structuring</u></p> <p>Education: University of North Carolina, Chapel Hill, J.D. University of North Carolina, Chapel Hill, BA Physics and Mathematics</p> <p>Business Experience 04/1986 – To Present: Corporate Finance, E.F. Hutton Co. Director of Taxes, Arthur Young & Co. Coopers & Lybrand</p> <p><u>Joseph F. Rowek, J.D., LL.M.- Estate and Income Tax, Business Structuring</u></p> <p>Education: New York University School of Law - LL.M. Taxation St. Mary's University School of Law - J.D. Fairleigh Dickinson University - BS Accounting</p> <p>Business Experience 01/1999 – To Present: Mutual Benefit Life Insurance Company - Counsel Internal Revenue Service, Estate and Gift Tax Division -Estate Tax Attorney Main LaFrentz & Co., CPA's</p> <p><u>David Porro - Insurance Design & Implementation</u></p> <p>Education: Boston University, Business Administration</p> <p>Business Experience 09/2006 – To Present: Bisys Insurance - Brokerage Director</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Summit Equities, Inc.

SEC File Number:
801-39162

Date:
3/31/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

IRS Empl. Ident. No.:

Item of Form (identify)	Answer
Part 11 6 (cont)	<p><u>Brian D. Loreti, J.D., LL.M.</u> - Estate & Income Tax</p> <p>Education: Boston University School of Law, LL.M. - Taxation Capital University School of Law - J.D. University of Connecticut - BA - Political Science</p> <p>Business Experience 06/1999 – To Present: Manager, Tax Research and Planning - Mutual Benefit Life Insurance Company Manager, Tax Research - Baker Industries Associate Attorney - Harvey R. Poe, P.A. Law Clerk - Honorable Joseph F. Scancarella, J.S.C.</p> <p><u>Michael S. Mirone, J.D., LL.M.</u> - Estate & Income Tax</p> <p>Education: New York University School of Law, LL.M. - Taxation Seton Hall University School of Law - J.D. Boston University School of Management - B.A. - Business Administration</p> <p>Business Experience 08/2004 – To Present: Sr. Associate, Trusts and Estates - Tax - Scarinci & Hollenbeck, LLC Associate, Trusts and Estates - Tax - Norris, McLaughlin & Marcus, P.A. Sr. Associate, Tax - Waters, McPherson, McNeill, P.C. Associate, Trusts and Estates - Sills, Cummis, Epstein & Gross, P.C. Associate, Tax - Hannoch Weisman, P.C.</p> <p><u>Richard Carrier, MBA</u> -Investment Strategies</p> <p>Education: Seton Hall University, MBA Finance Rutgers University, BA Business Administration</p> <p>Business Experience 08/1999 – To Present: Equities Trader/Analyst, Pershing Division of DLJ</p> <p><u>Robert W. Lamberti</u>-Investment Specialist, CFA, MBA</p> <p>Education: Temple University, MBA Finance Perdue University, BS Engineering</p> <p>Business Experience 07/2009 – To Present: Director of Asset Management, HBK Sorce Financial LLC Sr. VP, Portfolio Manager and Member of the Investment Committee, McHugh Associates, Inc.</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Summit Equities, Inc.

SEC File Number:
801-39162

Date:
3/31/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

IRS Empl. Ident. No.:

Item of Form (identify)	Answer
Part 11 7	(A) Summit Equities Inc. is a securities Broker/Dealer registered with the securities and Exchange Commission and the Financial Industry Regulating Authority. It is also a member of the SIPC.
Part 11 8C (3) & (4)	<p>(B) Steven Weinman is Chairman of the Board of Directors of Summit Financial Resources, Inc. a Registered Investment Adviser and financial planning firm, and owns 100 of the outstanding shares of Summit Financial Resources, Inc. Rembert D. McNeer, President, CFO and Director owns 21.435 shares. John M. Pappadopoulos is Secretary/Treasurer and Director of Summit Financial Resources, Inc. and owns 100 of the outstanding shares. Joseph W. Spada is a shareholder and a Director of Summit Financial Resources, Inc. and owns 100 of the outstanding shares. Salvatore R. Salvo, a Director, owns 56.980 shares, Michael W. Conway, a Director, owns 50.015, Frank Araneo owns 39.290 while Frank L. Vanore, Martin L. Singer, Steve Lieberman, David R. Chepauskas, Kevin P. Rex, Kenneth D. Durfee, Lawrence M. Bell, Davis I. Fischbach and Gregory Jandoli are shareholders of Summit Financial Resources, Inc and each owns 28.580 or less of the outstanding shares. Summit Equities, Inc. and Summit Financial Resources, Inc are related through common ownership.</p> <p>Summit Family Wealth Counseling, Inc. a Federally Registered Investment Adviser is a wholly owned subsidiary of Summit Financial Resources, Inc., and it provides similar planning services.</p> <p>Summit Investments Management, L.L.C., A New Jersey Limited Liability Company, of which Summit Investments, Inc. is the sole member. It is a Federally Registered Investment Adviser which provides investment services for a fee to individuals.</p>
Part 11 8C (9)	<p>The Summit Agency, a general agency contract, has as its General Agent, Salvatore R. Salvo, a principal of the applicant.</p> <p>Also an affiliate, of the applicant, Summit Risk Management, Inc. provides life and health insurance products and property and casualty products. Summit Equities, Inc. and Summit Risk Management, Inc. are related through common ownership.</p>
Part 11 8C (12)	<p>Petroleum Energy Development Co., Inc., is an affiliate of Summit Equities, Inc., and sponsors partnerships in oil and gas. Petroleum Energy Development, Inc. and Summit Equities, Inc. are related through common ownership.</p> <p>Petroleum Energy Development Co., Inc. (see 8 C 12 above) is Managing General Partner of oil and gas drilling limited partnerships in which clients were solicited to invest. Future oil & gas drilling partnerships may be formed in which clients may be solicited to invest.</p>
Part 11 8D	Summit Equities may, at the existing client's request, execute principal trades in order "to shop" the market for the best price for the client. Charges for these trades cover the cost for clearing such trades plus a fraction which is set at or lower than that which national discount brokerage firms charge.
Part 11 9A	<p>Summit Equities effects security transactions for compensation for any client (See Part II 12 B on Schedule F, Below). An affiliate of the applicant may earn fees or other compensation on Private Placement securities sold through Summit Equities, Inc. In such cases, the Private Placement Memorandum will disclose that Broker/Dealers or their affiliates may be compensated in such fashion.</p> <p>Summit Equities, Inc. has portfolios that may contain the same or similar securities as those recommended to clients. If Summit Equities, Inc. recommends a security to clients that Summit will buy for its own portfolio, the client's interest will have precedence over Summit's interest. In general, a client's order will be entered before Summit's or a RR's order in the same security. A copy of the firm's code of ethics is available to any existing or prospective client upon request.</p> <p>The applicant offers mutual fund/money tactical asset allocation services and imposes a minimum dollar amount of \$25,000.00 per account in order to participate in the program.</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Summit Equities, Inc.

SEC File Number:
801-39162

Date:
3/31/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

IRS Empl. Ident. No.:

Item of Form (identify)	Answer
Part 11 10	The applicant offers mutual fund/money tactical asset allocation services and imposes a minimum dollar amount of \$25,000.00 per account in order to participate in the program.
Part 11 12 A (1&2)	<p>Summit Equities, Inc. has discretionary investment management accounts for clients where it determines what mutual funds or individual equities and what amount of each are to be bought or sold in a particular portfolio. For these accounts, no load or Class A shares @ NAV are generally used. In the past, B or C Class shares fund accounts were created with any moves in these accounts made within the same family of funds. Some B or C share accounts continue to be managed, but generally no further such accounts are offered unless approved by the client</p> <p>For the non-discretionary buy and hold asset allocation accounts that have lower advisory fees, Class A, B, C, or no load shares can be purchased with the client's consent. The B or C Class shares may have a contingent deferred sales charge and higher fees and expenses than other mutual fund classes. All purchases are approved by the client in advance of the purchase.</p>
Part 11 12 A (3)	The accounts referred to in 12A (1 & 2) above are introduced to a clearing agent by Summit Equities, Inc.
Part 11 12 B	Applicant may suggest the broker or brokers through whom securities transactions are executed. A broker or brokers will be recommended upon their ability to provide necessary services for the client. Brokerage commission rates for stocks and bonds will be evaluated as to their reasonableness by comparison to FINRA standards. Receipt of research services is not a factor in selecting a broker.
Part 11 13 A	<p>All of the affiliates of the applicant as outlined in the preceding Schedule F Part II 8C may receive fees, commissions or other remunerations from non-clients which may be the result of a sale of product or service by the related entity to the client.</p> <p>Some Mutual Fund companies pay an annual 12 B-1 service fee to the Firm on different classes of shares which may result in a higher expense ratio for the mutual fund purchased for a client.</p>
Part 11 13 B	The applicant has solicitor agreements wherein fees are paid to a solicitor for referrals.

(Complete amended pages in full, circle amended items and file with execution page (page 1).)