

Part 2A of Form ADV: *Firm Brochure*

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This document provides information about the qualifications and business practices of Summit Investment Guidance Partners. 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. Please contact us if you have any questions about the contents of this brochure.

Additional information about Summit Investment Guidance Partners is available on the Securities and Exchange Commission (SEC) website at www.adviserinfo.sec.gov. You can search this site by the unique identifying number 130405, which is known as our firm CRD number.

Item 2 Material Changes

The SEC adopted "Amendments to Form ADV" in July, 2010 as a result of the "Dodd-Frank Wall Street Reform and Consumer Protection Act." As a registered investment adviser, our firm is required to comply with the new reporting and filing requirements. This February 29, 2012 Firm Brochure is our disclosure document prepared according to the new rules and requirements. It is a narrative that is substantially different in form and content from pre-2011 versions and it includes some new information that we were not previously required to disclose.

After our initial filing of this Brochure, it will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information. Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of our business fiscal year end. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Item 3	Table of Contents	Page
Item 1	Cover Page	1
Item 2	Material Changes	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
Item 5	Fees and Compensation	5
Item 6	Performance-Based Fees and Side-By-Side Management	7
Item 7	Types of Clients	8
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9	Disciplinary Information	12
Item 10	Other Financial Industry Activities and Affiliations	12
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
Item 12	Brokerage Practices	14
Item 13	Review of Accounts	16
Item 14	Client Referrals and Other Compensation	17
Item 15	Custody	18
Item 16	Investment Discretion	18
Item 17	Voting Client Securities	19
Item 18	Financial Information	19

Item 4 **Advisory Business**

Summit Investment Guidance Partners is a registered investment adviser with a single office in Grand Rapids, Michigan. It is registered, and organized as a limited liability company, under the laws of the State of Michigan. Scott M. Pruski is the founding principal and sole shareholder of the firm, which began conducting business in 2004. We actively manage \$60,109,900 of clients' assets on a discretionary basis as of February 29, 2012 and do not accept non-discretionary client accounts. Summit Investment Guidance Partners offers **Investment Supervisory Services (Individual Portfolio Management)** to the clients we serve.

We provide continuous advice and investment guidance to people based on their personal, and family, financial needs. During a discovery process, we explore personal circumstances, goals, priorities, time horizons, financial resources, liquidity needs, risk tolerance, total return objectives, family background, prior investment experiences and tax considerations. After appropriately understanding these factors, we develop a personal investment policy, then create and manage a portfolio based on that policy.

Our investment guidance is truly "open architecture" and not limited to any particular product, platform or service offered by any bank, broker-dealer, insurance company or other provider. While able to evaluate and consider third-party advisors and investment managers for use in client portfolios, we typically utilize institutional mutual funds, no-load mutual funds and exchange-traded funds (ETF's) as tools to implement our holdings in these underlying investments:

- Certificates of deposit.
- Municipal debt securities (municipal bonds).
- United States and foreign government securities.
- Corporate bonds, commercial paper and other debt securities.
- Domestic and foreign equity securities (stocks) that may be exchange-listed and/or traded over-the-counter.
- Futures contracts on tangibles and/or intangibles.
- Options contracts on securities and/or commodities.
- Real estate, oil & gas, precious metals and other natural resources.

Via the tools noted above, our portfolios commonly include both "long" exposures that may gain in rising markets and "short" exposures that may gain in falling markets. We do not manage portfolios relative to a common stock-market index or other benchmark that is probably irrelevant to the financial goals, priorities and needs of the people we serve. Instead, we strive to manage purpose-driven portfolios for absolute results that are desirable to the particular client, as consistently as possible, and aligned with their priorities. Our investment strategies are globally-unconstrained and built for client-centered results.

Realistically, we can not guarantee any aspect of our future performance; range or level of performance; or investment management, strategy or profitability. Because investments involve varying degrees of risk, clients may impose reasonable restrictions that do not interfere with our investment operations, process or strategies.

Summit Investment Guidance Partners may publish or provide monthly and/or quarterly newsletters to share general information on various financial topics including, but not limited to, economic perspectives, market observations, estate and retirement planning, etc. No specific investment recommendations are provided in such material and the information offered does not purport to meet the objectives or needs of any individual. It is distributed free of charge and only to a limited audience of current and potential advisory clients.

Item 5 Fees and Compensation

Summit Investment Guidance Partners provides discretionary investment guidance services on a fee-only basis, with fees based upon one or more of the following service offerings for Portfolio Assets: Strategic Investment Portfolios, Discounted Depositor Reserves & Legacy Asset Accounts and/or No-Fee Convenience Accounts.

Strategic Investment Portfolios are the core service offering and may consist of one or more accounts that are managed as an intermediate to long-term investment portfolio. Other than the possibility of a relatively small systematic annual withdrawal (commonly less than four percent), these assets typically will not be used or spent in less than three to five years. They are not intended as short-term emergency, opportunity or cash-cushion reserves, but as longer-term strategic investments with the following blended fee schedule:

- 1.00% per year for the first \$1,000,000 of assets under management;
- 0.80% per year of the next \$1,000,000;
- 0.70% per year of the next \$3,000,000;
- 0.50% per year of the next \$5,000,000; and
- 0.30% per year for the portion over \$10,000,000.

In conjunction with a Strategic Investment Portfolio as the core service offering, Summit Investment Guidance Partners may offer one or more **Discounted Depositor Reserves & Legacy Asset Accounts** in exchange for a flat fee of 0.20% per year, subject to a \$62.50 minimum per quarter. These accounts may contain multiple coordinated money market funds, with or without cash management features, as well as short-term income-oriented investments, and legacy assets with stop-loss limits.

With a Strategic Investment Portfolio as the core service offering, we may also offer and maintain one or more **No-Fee Convenience Accounts** with no annual fee for investment guidance services. These accounts may contain one core money market fund, with or without cash management features, and any potential unsupervised legacy assets.

The Summit Investment Guidance Partners annual investment advisory fee is prorated and paid quarterly in advance, based upon the market value of the assets on the last business day of the previous calendar quarter.

Fees are debited directly from the account(s), in accordance with the client authorization in our Investment Guidance Agreement. We generally require minimum investable assets, aggregated among one or more household accounts, of \$1,000,000 and/or a minimum annual fee of \$10,000 for new client relationships. In our sole discretion and subject to a fixed fee up to 1.20% annually, we may reduce the minimum investable amount and/or minimum annual fee based upon certain criteria such as anticipated future earning capacity, anticipated future additional investments, related clients and personal relationships. Our advisory fees are not negotiable.

Termination of the Advisory Relationship: An Investment Guidance Agreement may be canceled at any time, by either party, for any reason, upon receipt of written notice. Upon termination of an account, any prepaid unearned fees will be promptly refunded with a pro-rated reimbursement according to the number of days remaining in the billing period.

Mutual Fund Fees: Fees paid to Summit Investment Guidance Partners for investment advisory services are separate and distinct from the internal fees and expenses charged to shareholders by mutual funds and/or ETF's. These fees and expenses are described in each fund prospectus. Such fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services, and not receive the services provided by our firm which are designed, among other things, to determine which mutual fund or funds are most appropriate to each client's financial priorities. Clients should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to evaluate the advisory services being provided.

Wrap Fee Programs and Separately Managed Account Fees: Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisers, which may be charged as part

of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Portfolio transactions may be executed without commission charges in a wrap fee program. In evaluating such an arrangement, the client should also consider that depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be applicable.

Additional Fees and Expenses: In addition to our advisory fees, clients are responsible for any fees and expenses charged by custodians and/or broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which any independent investment manager effects transactions for client accounts. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Clients should note that similar advisory services may or may not be available from other registered or unregistered investment advisers for similar or lower fees. Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Item 6 Performance-Based Fees and Side-By-Side Management

Summit Investment Guidance Partners does not charge performance-based fees.

Item 7 Types of Clients

Summit Investment Guidance Partners specializes in providing advisory services to high net worth and other individuals. We also serve closely-held corporations and other business entities that are owned and controlled by high net worth individuals. As previously disclosed in Item 5, our firm has established certain minimum requirements for new client relationships.

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

METHODS OF ANALYSIS

Because no single method is perfect and we strive to be as thorough as possible, we commonly use one or more of the following methods of analysis when formulating our investment strategies and/or advice.

Asset Allocation: Rather than focusing primarily on specific security selection, we seek to identify a desirable mix of stocks, bonds, cash and other assets that is appropriate for the client's personal priorities, financial goals and investment-risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases from a particular security, industry or market sector. Another risk is that the ratio of stocks, bonds, cash and other assets will change over time from market movements and, if not rebalanced, will no longer be appropriate for the client.

Fundamental Analysis: We attempt to measure the gain and loss potential of an investment by looking at economic and financial factors such as the global economy, government policies, political realities, consumer demographics, consumer behavior and industry conditions. Fundamental analysis does not attempt to predict near-term price movements. This presents a potential risk, as the price of an investment can move up or down with a broader market, regardless of the economic and financial factors considered.

Technical Analysis: We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company, industry or national economy and presents a risk in that a poorly-managed or financially-unsound company, industry or national economy may underperform regardless of other market movements.

Charting: In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict how long the trend may last and when that trend might reverse.

Cyclical Analysis: In this form of technical analysis, we measure the movements of a particular asset class or segment of an economy, relative to a broader market or economy, in an attempt to predict future price movements within intermediate-term cycles and long-term super cycles.

Mutual Fund and/or ETF Analysis: We consider the experience, organizational structure and track record of the manager(s) of the mutual fund or ETF to determine if a manager has achieved desirable results over time and in different economic conditions. We evaluate the content of a mutual fund or ETF to determine if there are complimentary benefits to adding the underlying investments and/or management strategies to a specific portfolio. We monitor the expenses, tax-efficiency and adherence to stated objectives.

A risk of mutual fund and/or ETF analysis is that, with all investments, past performance does not guarantee future results. A manager who has been successful may not replicate that success in the future. Because we do not control the underlying investments in a fund or ETF, managers of different funds held by a client may purchase the same security, increasing the risk if that security loses value. There is also a risk that a manager may deviate from the investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for a client's portfolio.

Qualitative Analysis: We subjectively evaluate non-quantifiable factors such as the quality of management, interpersonal dynamics, talent depth, research strength and other factors not readily subject to measurement. A risk of using qualitative analysis is that our subjective judgments may prove incorrect.

Our analytical methods rely on an assumption that the companies whose securities are bought and sold, the rating agencies that review securities and other publicly-available sources of information about securities, are providing accurate and appropriate data. While we are alert to indications that data may be incorrect, **there is always a risk that our analysis can be compromised by inaccurate or misleading information that creates risks for all forms of analysis.**

INVESTMENT STRATEGIES

Because no single strategy always works perfectly, we may employ one or more of the following strategies in serving our clients, based on appropriateness and consistency with client needs, priorities, investment objectives, risk tolerance, time horizons and other considerations.

Long-term purchases: We typically purchase securities with the idea of holding them in a client portfolio for a year or longer because we usually want exposure to a particular asset class over time, regardless of shorter-term prospects. One risk in a long-term strategy is that by holding for such a period of time, we may not capture short-term gains that could be profitable to a client. It is also possible that a security could decline sharply in value before we take action to sell.

Short-term purchases: We may purchase securities with the idea of selling them within a relatively short period of time, typically a year or less, in an effort to capitalize on conditions that we believe will soon result in a favorable price swing, or for tax-loss harvesting that can enhance after-tax portfolio results. The risk of a short-term purchase strategy is that if the anticipated price swing does not materialize, we are left with the possibility of holding a long-term investment that was intended as a short-term purchase, or potentially taking a loss. This strategy involves more frequent trading than a longer-term strategy and will result in increased brokerage and other transaction-related expenses, as well as less favorable tax treatment on short-term capital gains.

Margin transactions: We are generally opposed to using margin in a brokerage account. Margin allows you to purchase more investments than you can afford with your available cash and magnifies losses substantially.

Option writing: An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. A security, just like a stock or

bond, an option is also a derivative, because it derives its value from an underlying asset. We are generally opposed to using options directly, in a brokerage account, because the management talent that we can employ through a mutual fund is far more effective, efficient and expert with option strategies than we can be at Summit Investment Guidance Partners.

RISK OF LOSS

Securities are not guaranteed and you may lose money on your investments. We ask that you communicate openly with us to help clarify your emotional tolerance, and financial capacity, for investment risk.

Item 9 Disciplinary Information

While we are required to disclose any legal or disciplinary events that are material to the consideration of our advisory business, or the integrity of our management, neither our firm nor our management personnel have any disciplinary events to report.

Item 10 Other Financial Industry Activities and Affiliations

Our firm and our personnel are not engaged in other financial industry activities and have no other industry affiliations.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. Summit Investment Guidance Partners and our personnel owe a duty of loyalty, fairness and good faith to our clients. We have a responsibility to adhere not only to the specific provisions of the Code of Ethics, but to the general principles that guide it.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by anyone associated with our advisory practice who has access to advisory recommendations ("access personnel"). Among other aspects, our Code of Ethics requires prior approval of any acquisition of limited offering (e.g., private placement) or initial public offering securities. It also contains oversight, enforcement and recordkeeping provisions.

Summit Investment Guidance Partners' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email at info@SummitIGP.com or by calling us at (616) 954-2501.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (1.) making decisions in the best interest of advisory clients and (2.) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell, for their personal accounts, securities that are identical to, or different from, those recommended to our clients. Related person(s) may have an interest or position in one or more securities which may also be recommended to a client. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, to prevent such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

We commonly aggregate employee trades with client transactions when possible and compliant with our duty to seek best execution for all clients. In such instances, participating clients receive the same average share price and transaction costs are shared appropriately. In situations with a partial fill of a particular batched order (block trade), we will allocate all purchases or sales pro-rata, with each account receiving the same average price per share. Depending on what is most advantageous to clients, employee accounts may be excluded or included in the pro-rata allocation.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) when their decision is a result of information received as a result of his or her employment, unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory clients.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. We maintain a list of all reportable securities holdings for our firm and anyone associated with our advisory practice who has access to advisory recommendations ("access personnel"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his designee.
6. We have established procedures for the maintenance of all required books and records.
7. All of our principals and employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
8. We require delivery and acknowledgement of the Code of Ethics for each supervised person of our firm.
9. We have established policies requiring the reporting of Code of Ethics violations to management.
10. Any individual who violates any of the above restrictions may be subject to termination.

Item 12 Brokerage Practices

Summit Investment Guidance Partners does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

We require our discretionary management clients to provide us with written authority to determine the broker-dealer for use and the commission costs to be incurred for purchase and sale transactions. This authority is documented in our Investment Guidance Agreement (IGA). Clients must include any agreed-upon limitations to our discretionary authority in the IGA. Any changes or amendments to these limitations must be provided to us in writing.

Summit Investment Guidance Partners will commonly bundle or batch orders, using block trades, to provide trade execution at the same average share price for all involved client accounts. Block trading allows the timely and equitable trading of aggregate blocks of securities, composed of assets from multiple client accounts, as long as transaction costs are shared appropriately by all accounts included in any such block.

The block trading policy and procedures for Summit Investment Guidance Partners are:

1. Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with Summit Investment Guidance Partners or our firm's order allocation policy.
2. The trader and portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
3. Based on a good-faith judgment at the time the order is placed, the portfolio manager must reasonably believe that the order aggregation will benefit each client participating, and will enable Summit Investment Guidance Partners to seek best execution, in the aggregated order. It does not require that the

determination made in advance of the transaction must always prove to have been correct with the benefit of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, not just the best net price.

4. Prior to entry of an aggregated order, documentation must be completed that identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
5. If the order cannot be fully executed at the same price or time, the securities purchased or sold by the close of each business day must be allocated pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. Adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account or to avoid excessive trade costs in smaller accounts.
6. Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order, and must pay the trade cost(s) applicable to their specific account. Under the client agreement with the custodian/broker-dealer, transaction costs may be based on the number of shares traded for each client account.
7. If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
8. Summit Investment Guidance Partners' client account records separately reflect the securities that are held by, and bought and sold for, for each individual account involved with an aggregated transaction.
9. Funds and securities for aggregated orders are clearly identified on Summit Investment Guidance Partners' records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
10. No client or account will be favored over another.

Summit Investment Guidance Partners has an independent arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity"), through which Fidelity provides a variety of institutional services. Among others, these services include brokerage, custody, administrative support, record keeping and related services. They also include software and other technology that (i) provides access to client account data, including trade confirmations and account statements; (ii) facilitates trade execution and aggregated trade orders for multiple client accounts; (iii) provides research, pricing and other market data; (iv) facilitates payment of fees from client accounts; and (v) assists with back-office functions and client reporting.

While these services are intended to help independent advisory firms like Summit Investment Guidance Partners conduct business and serve the best interests of clients, they may also benefit our firm. Summit Investment Guidance Partners and Fidelity are not affiliated.

Fidelity also makes available to our firm certain research and brokerage services at no additional charge to us, including research material that Fidelity may obtain directly from independent research companies, as selected by Summit Investment Guidance Partners. These research and brokerage services presently include general economic, financial and market commentary; practice management information; and the "Wealth Central" account service, management and trading technology application. Without this independent Fidelity arrangement, we might be compelled to purchase the same or similar services at our own expense.

Because we receive such services for no additional cost, we may have an incentive to continue or expand our use of Fidelity's services. We examined this potential conflict of interest when we chose to enter our relationship with Fidelity and determined that the relationship is in the best interests of our clients and satisfies our client obligations, including our duty to seek best execution.

Fidelity does not charge our clients or us separately for custody services, but is compensated by account holders in a variety of ways. Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions. Transaction fees are charged for certain institutional and no-load mutual funds, while trade commissions are charged for ETF, individual equity and debt securities transactions. Fidelity enables Summit Investment Guidance Partners to obtain many no-load mutual funds without transaction charges. While the Fidelity commission and transaction fees are generally considered discounted from customary retail commission rates, they may be higher or lower than those charged by other custodians and broker-dealers.

A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction, where we determined in good faith that the commission is reasonable in relation to the value of the brokerage and research services provided. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, considering the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates and timely responsiveness.

While Summit Investment Guidance Partners will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by us will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account(s).

Item 13 Review of Accounts

As part of the **Investment Supervisory Services (Individual Portfolio Management)** that we provide for the clients we serve, the underlying securities within our portfolios are continually monitored. Individual accounts and household portfolios are typically reviewed quarterly or more often. Reviews are conducted in the context of individual and/or household investment objectives and guidelines. Additional or unscheduled reviews may be prompted by material changes in variables like the client's personal circumstances as well as the economic, market or political environment. Individual accounts and household portfolios are reviewed by Scott M. Pruski (Principal), Michael T. Baker (Associate) and/or Stephen H. Pangle (Associate).

In addition to the transaction confirmations and monthly statements that clients receive from the broker-dealer and/or custodian, Summit Investment Guidance Partners typically provides quarterly reports summarizing account values, holdings, activity and results for portfolios meeting our minimum investable assets amount.

Item 14 Client Referrals and Other Compensation

It is a policy of Summit Investment Guidance Partners not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm. We do not accept, or allow our related personnel to accept, any form of compensation, including cash, non-cash sales awards or other prizes from any non-client (such as a vendor or service provider) in conjunction with the advisory services we provide for our clients.

Item 15 Custody

Although we previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts, our firm does not have actual or constructive custody of client accounts.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from the client account. On at least a quarterly basis, and typically monthly, the custodian is required to send the client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other details. Clients should contact Summit Investment Guidance Partners directly if they believe there may be an error.

Item 16 Investment Discretion

Clients hire us to provide discretionary asset management services, empowering us to place trades in a client's account(s) without contacting the client for permission prior to each trade. Our discretionary management authority includes the ability to determine the specific security to buy or sell and/or to determine the amount of a security to buy or sell. We are empowered with discretionary management authority when clients sign an Investment Guidance Agreement (IGA) with our firm. Clients may reasonably limit this authority by giving us written instructions and change or amend such limitations by once again providing written instructions.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. While our firm provides investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1.) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2.) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other events pertaining to the client's investment assets. Clients are responsible for instructing the custodian(s) to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. We do not offer any consulting assistance regarding proxy issues to clients.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of any fees more than six months in advance of services rendered. Therefore, we are not required to include a financial statement. As an advisory firm that maintains discretionary authority for client accounts and is required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations, Summit Investment Guidance Partners has no additional financial circumstances to report. Summit Investment Guidance Partners has never been the subject of any bankruptcy petition.

Item 19 Requirements for State-Registered Advisers

Scott M. Pruski is the founder, principal and sole shareholder (member) of Summit Investment Guidance Partners. Information regarding his formal education and business background is provided in the Form ADV Part 2B Brochure Supplement that follows this document.

We are required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulatory or administrative proceedings in which our firm or management personnel were found liable or against whom an award was granted. Neither our firm, nor Scott M. Pruski, has any reportable disciplinary events to disclose.

As disclosed in Item 6 above, neither Summit Investment Guidance Partners nor any of our personnel are compensated for our advisory services with performance-based fees. As disclosed in Item 10 above, neither Summit Investment Guidance Partners nor any of our personnel have a material relationship or arrangement with any issuer of securities.