



Form ADV Part 2A

## Cover Page

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Date: June 20, 2012

Disclaimer: This brochure provides information about the qualifications and business practices of Summit Global Investments. If you have any questions about the contents of this brochure, please contact us at 888-251-4847 and/or [info@summitglobalinvestments.com](mailto:info@summitglobalinvestments.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration with a state or the SEC does not imply a certain level of skill or training.

Additional information about Summit Global Investments also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 Material Changes**

This is an other than annual amendment.

## Items of Table of Contents

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 .....	6
Item 7 Types of Clients .....	6
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....	6
Item 9 Disciplinary Information .....	7
Item 10 Other Financial Industry Activities and Affiliations .....	7
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	9
Item 12 Brokerage Practices .....	10
Item 13 Review of Accounts .....	10
Item 14 Client Referrals and Other Compensation .....	10
Item 15 Custody .....	11
Item 16 Investment Discretion .....	11
Item 17 Voting Client Securities .....	11
Item 18 Financial Information .....	11
Item 19 Requirements for State-Registered Advisers .....	12
Form ADV Part 2B .....	14

## Item 4 Advisory Business

### A. Summary

Summit Global Investments (also hereafter referred to as SGI) is a Limited Liability Company registered with the State of Utah in October 2010. SGI's investment advisory services are primarily limited to the discretionary management of investment portfolios for individuals, investment companies, pension and profit sharing plans, trusts, and corporate and business entities, and institutional investors. The principal owners of SGI are David Harden, Bryce Sutton and Mark Kenison. David Harden began his career in the financial services industry in 1993 with Fidelity Investments. Mark Kenison began his career in the financial services industry in 1995 with Fidelity Investments. Bryce Sutton began his career in the financial services industry in 1996 with Morgan Stanley.

### B. Advisory Services

#### Investment Management Services

In the event the client determines to engage SGI to provide investment management services, SGI shall implement a low volatility equity strategy. This strategy is an all-equity strategy and only appropriate for clients who wish to invest in the U.S. stock market through a single equity investment strategy. SGI strives to adhere to industry best practices and to maximize risk adjusted returns. These practices include but are not limited to security selection through rigorous fundamental and quantitative analysis. All accounts are managed on a *fee* basis.

SGI shall generally allocate the investment management assets of its clients, on a discretionary basis, among various individual equity securities that meet our Low Volatility screening criteria.

The low volatility strategy targets U.S. equities that have demonstrated high risk return trade-offs, meeting SGI's proprietary algorithms and criteria. Clients investing in this strategy are exposing their investment to various risks including market risk, individual equity risk, and volatility risk. This investment strategy is only suitable for investors with a moderate to high risk tolerance, and a long-term time horizon for this investment. SGI screens potential clients suitability by asking potential clients of SGI what their current investments are, learning about their overall exposure to US equities and their time frame to stay invested with SGI. For potential clients that do not fit this level of risk, SGI will recommend they seek other advice outside of SGI. Suitability for all clients is also documented in the client account opening documents signed by all clients of SGI.

SGI also advises on assets for certain clients and provides proprietary technology and quantitative modeling that is used by these clients to internally manage low volatility equity strategies.

#### Sponsored Investment Management Platforms:

Pursuant to a written agreement by SGI and a sponsor, SGI provides model investment advisory services to the sponsor's clients. The terms and conditions of this relationship are determined by the sponsor. The client signs an agreement with the sponsor with the help of a sponsor representative. Through this agreement the program sponsor obtains the information necessary to determine the client's suitability. The client's account and funds will be held and cleared through a custodian and broker-dealer selected by the sponsor.

SGI will provide discretionary investment advice on the portion of funds delegated to SGI. This power and authority is granted by the client in the program sponsors agreement. SGI will provide model trading instructions to the sponsor or a third party as directed by the sponsor who will be responsible for executing SGI's recommended trades. SGI has no responsibility for transaction execution.

The program sponsors representative is required to provide the client with a copy of SGI's disclosure brochure.

See Item 5 for a summary of service fees associated with Sponsored Investment Management Platforms.

#### C. Portfolio Construction

The investment advice provided is consistent for all clients of SGI. Smaller sized accounts may have slightly different holdings than larger sized accounts in order to limit trading costs for the client. However, all accounts managed by SGI will hold stocks that meet the screening criteria of the firm. Once the portfolio is constructed, SGI provides continuous supervision and re-optimization of the portfolio as changes in market conditions and client circumstances may require. Clients may impose restrictions on investing in certain securities or types of securities in consultation with SGI.

#### D. Wrap Programs

SGI does not participate in wrap fee programs.

E. SGI manages on a discretionary basis approximately \$2,500,000 of client assets as of June 19, 2012.

### Item 5 Fees and Compensation

<u>Equities – Separate Accounts</u>	<u>Fee</u>	<u>Minimum</u>
Low-Volatility Equity	1.0%	\$200,000

A. SGI's annual investment management fee, shown above, shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter. SGI's investment management fee shall be pro-rated through the date of termination, and the remaining balance (if any) shall be promptly refunded to the client. Further, SGI may not assess an advisory fee where the firm offers advisory services to employees or family members of related persons. Unless the client directs otherwise, all such investment management accounts will be maintained at various custodial/clearing firms. SGI's investment management fees are negotiable if a client's assets under SGI's management exceed \$5 million.

B. SGI will deduct the annual investment management fee on a quarterly basis directly from client accounts. SGI will send each client an invoice of the quarterly fees at the same time that fees are deducted from client accounts. These fees will also show on the client's monthly statement from the custodian. SGI's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

C. SGI is a fee only investment advisor. No commissions or asset based sales charges are received

from the purchase of individual securities in order to eliminate the potential for conflict of interests.

#### General Information on Advisory Services and Fees

The fee charged is calculated as described in the above schedule and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory Client.

All fees paid to SGI are separate and distinct from the fees and expenses charged by broker-dealer/custodians. Registrant fees are also separate and distinct from separate account management and custody.

SGI does not represent warranty or imply that the services or methods of analysis used can or will predict future results, successfully identify market tops or bottoms, or insulate Clients from losses due to market corrections or crashes. Although SGI believes its advisory fees are competitive, lower fees for comparable services may or may not be obtained from other sources.

#### Sponsored Investment Management Platforms:

Per the written agreement by SGI and a sponsor, SGI may receive an annual fee no greater than 1.00% of the market value of the assets it provides services on. The exact fee calculation and timing of the fee to be charged will be determined by the program sponsor and SGI. The sponsor will calculate and deduct the appropriate fees from the client account and remits those fees to SGI.

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

SGI does not currently have performance-based pricing or Side-by-side management.

### **Item 7 - Types of Clients**

Currently, SGI provides portfolio management services to individuals, corporate pension and profit sharing plans, institutional investors and to a mutual fund registered under the Investment Company Act of 1940. SGI has a minimum to open and maintain a separate account of \$200,000, and offers an Institutional Share Class of a mutual fund with a \$1,000,000 minimum. SGI makes an exception to this minimum for participants in Sponsored Investment Management Platforms and its mutual fund. SGI reserves the right to accept clients with smaller portfolios based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing clients. SGI may aggregate the portfolios of family members to meet the minimum portfolio size.

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

SGI employs its own proprietary systematic stock valuation process to evaluate companies and construct portfolios. It is designed to feature SGI's stock selection skills through fundamentally based, quantitative analysis of investment characteristics while controlling for unpredictable elements and risks. Information on stocks comes from external data providers and computer databases as well as newspapers, research material prepared by others, and our own proprietary databases. We apply our insights regarding market, economic, industry, and company fundamentals to calculate intrinsic values for thousands of stocks. SGI constructs portfolios using a systematic portfolio optimization approach. As with any active equity strategy, investing in securities involves risk of loss that clients should be prepared to bear.

The implementation of SGI's investment strategies includes long-term and short-term purchases, as well as trading (i.e., securities sold within 30 days) which can affect investment performance, particularly through increased brokerage and other transaction costs.

Further, specifically for all of SGI's investment strategies, there is a risk of loss associated with our use of third-party data and risk models in managing client portfolios.

**Risk of owning equities:** Equities represent ownership in a public company. **Market risk** – broad corrections in the overall market can affect the value of any stock we may buy for your account. **Company risk** – a stock's price can decline due to changes in the company's underlying fundamentals. If a company's growth slows or profit margin declines, then the stock price may also decline. If a prominent company leader such as the CEO, CFO or President resigns or are fired from the company, the stock price could decline. **Merger risk** – in the event that a company is bought out by another company, the acquiring company may not be as desirable by the overall market. This could cause the stock's price to decline. **Dividend risk** – The dividends that a stock pays can be reduced or eliminated by a company at any time. A change in a stock's dividend could cause the stock's price to decline.

#### U.S. Low Volatility U.S. Equity Strategy

**Objective:** The strategy employs a systematic process to invest in companies in the S&P 500 universe, considering both return and risk expectations. By emphasizing low volatility securities, the strategy seeks to achieve equity market returns with significantly lower volatility.

**Points of Distinction:** Provides diversified exposure to US Stocks, with lower volatility than the S&P 500 Index and is suitable for a core, domestic equity mandate. It is actively managed, employing a systematic investment approach.

**Benchmark:** S&P 500 Index

## Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Summit Global Investments or the integrity of SGI's management. Neither SGI, David Harden, Bryce Sutton nor Mark Kenison have any information applicable to this item.

## Item 10 - Other Financial Industry Activities and Affiliations

A. SGI is not a broker-dealer, or a registered representative of a broker-dealer. Registration with a state or the SEC does not imply a certain level of training. No SGI management persons are registered representatives or registered as broker/dealers.

B. Neither SGI nor any of its management persons are registered futures commission merchant, commodity pool operator, commodity trading adviser, or an associated person of the foregoing entities.

C. Other Affiliations

Mark Kenison remains employed as President and owner of Turning Point Financial, a North Carolina state registered investment advisory firm. Mr. Kenison will continue to spend approximately 40 hours per

week with Turning Point Financial and 20 hours per week with SGI. There is no business relationship between Turning Point Financial and SGI. Mr. Kenison may on occasion refer a client from Turning Point Financial to SGI for single-equity investment management, in which instance a conflict of interest would exist because Mr. Kenison could be receiving compensation from both SGI and Turning Point Financial from the same client's assets.

Mark is a licensed insurance agent and is contracted with many insurance companies. There is no business relationship between Mr. Kenison's insurance business and SGI and he will not be offering any insurance products to clients of SGI. If SGI were to sell an insurance product to a client a conflict of interest would exist due to Mr. Kenison being an insurance agent. He could stand to benefit from the sale of an insurance product to an SGI client. Mr. Kenison may at times recommend SGI to clients of Turning Point Financial, in which case a conflict of interest would exist

#### D. Referrals from Independent Advisers

While SGI does not currently have any independent investment advisers who refer business to us, third-party investment advisers may refer clients to SGI for asset management services. All third-party investment advisers that SGI accepts client referrals from must be a state licensed investment adviser or a registered investment adviser with the Securities and Exchange Commission.

Clients, who are referred to SGI will receive full disclosure, including services rendered and fee schedules, at the time of the referral by delivery of a copy of the relevant Form ADV Part 2, or equivalent disclosure document. As stated above, third-party investment advisers and their IARs may receive compensation from SGI for referring clients. Such compensation may differ depending upon the individual agreement with each third party investment adviser.

Clients will sign an advisory agreement with SGI. Either SGI or the client, in accordance with the provisions of those agreements may terminate the advisory relationship. In the event compensation is payable in advance, the client will typically receive a pro rata refund of any prepaid advisory fees upon termination of an advisory agreement. Should SGI enter into an agreement with any third party investment advisers or solicitors and compensate them for new client referrals this would create a conflict of interest. SGI does not recommend or select other advisers or their services for clients of SGI.

#### Solicitation Agreements

Solicitors may refer clients to SGI for asset management services. All solicitors that SGI accepts client referrals from must be a state licensed investment adviser or a registered investment adviser with the Securities and Exchange Commission, except in the State of California, which exempts this requirement. Currently, SGI does not currently have any solicitation agreements in place. Should SGI enter into an agreement with any third party investment advisers or solicitors and compensate them for new client referrals this would create a conflict of interest.

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

#### Code of Ethics

A. Summit Global Investments has developed a Code of Ethics Policy based on the principle that all employees of the company and certain other persons have a fiduciary duty to place the interest of clients ahead of their own and SGI's. The Code of Ethics applies to all employees, directors, officers, partners or



members of the Company who agree to avoid activities, interests and relationships that might interfere with making decisions in the best interests of SGI's Advisory Clients. The Code of Ethics covers such areas as fiduciary duty, confidentiality, gifts, reporting, record keeping and personal securities trading. SGI requires annual certification of compliance with the company's Code of Ethics. The Code of Ethics is available to all clients upon request.

B. SGI does not recommend securities in which they have a material financial interest.

C. Participation or Interest in Client Transactions. SGI, or advisory representatives of the firm, may buy or sell –for their personal account(s) – investment products identical to those recommended to clients according to the Firm Policy detailed below. These investment products are widely held and publicly traded. It is SGI's expressed policy that no person employed by it shall effect for himself or herself or for his or her immediate family (i.e. spouse, minor child) (collectively "associated persons") any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of SGI's clients, unless in accordance with the following Firm Policy procedures.

#### Firm Policy

In order to implement SGI's investment policy, the following procedures have been put into place with respect to SGI and its associated persons:

1. If SGI is purchasing or considering for purchase any security on behalf of SGI's client, no associated persons may transact in that security prior to the client purchase having been completed by SGI, or until a decision has been made not to purchase the security on behalf of the client; and
2. If SGI is selling or considering the sale of any security on behalf of SGI's client, no associated person may transact in that security prior to the sale on behalf of the client having been completed by SGI, or until a decision has been made not to sell the security on behalf of the client.

#### Exceptions

1. This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of SGI's clients trade in sufficiently broad markets to permit transactions by clients to be completed without any appreciable impact on the markets of the securities.

Under certain circumstances exceptions may be made to the policies stated above. Records in these trades, including reasons for the exceptions, will be maintained with SGI's records in the manner set forth above. Should this type of trading occur, a conflict of interest may exist depending upon the price at which these trades are either purchased or sold.

2. It is further noted that SGI's investment advisory business is in and shall continue to be conducted in compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, SGI has adopted a firm wide policy statement outlining insider-trading compliance by the firm, and the associated persons and other employees.

Example: There could be a potential conflict of interest if an employee of SGI knew that SGI was going to be buying a particular security in a large quantity and prior to that happening, the employee bought the same security for himself or herself in their own account. After that, if SGI bought that same security in large share amounts, the stock price could be affected which would benefit the employee unfairly. This is why we would only allow this to happen if the size of the SGI trade was going to be small enough that the stock price would not be affected by the trades. Should this type of trading occur, a conflict of interest would exist depending upon the price at which these trades are either purchased or sold.

## Item 12 - Brokerage Practices

### Investment or Brokerage Discretion

A. SGI manages client's accounts on a fully discretionary basis. SGI may utilize its discretionary authority to determine: the securities to be bought or sold and the amount of the securities to be bought or sold. However, these purchases may be subject to specified investment objectives and guidelines. For example, a Client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio. To the extent applicable, custodians and/or broker-dealers generally charge transaction fees and/or commissions for effecting certain securities transactions. SGI does not receive any free research, client referrals, or any other form of soft dollar benefits for placing client accounts with any particular broker/dealer.

With respect to the mutual fund, SGI has discretionary authority to recommend particular broker/dealers and custodians. The commission fees charged by the broker-dealer/custodian firms where a client account is held may be higher or lower than those charged by other broker-dealer/custodians. SGI will not receive any portion of the brokerage commissions and/or transactions fees charged to *fee-only* clients. Securities transactions through broker-dealers/custodians and the brokerage commissions and/or transaction fees or from designated broker-dealer/custodians directed by clients of SGI are exclusive of, and in addition to, SGI's investment management fee. Although the commissions paid by SGI's clients shall comply with SGI's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker dealer might charge to effect the same transaction.

With respect to sponsored investment management programs, SGI is directed to place trades with certain broker/dealers. As a result of this the sponsored accounts may trade before or after other advisory client accounts of SGI depending upon when changes to the sponsored program portfolios are actually traded. This may result in sponsored accounts receiving less favorable execution.

SGI will always work with a client's broker/dealer to negotiate competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions.

B. SGI will aggregate the purchase and/or sale of securities for various client accounts when it has the opportunity to do so and where it is cost effective to do so. This will ensure that all accounts receive the same execution prices on trades of the same security.

## Item 13 - Review of Accounts

- A. SGI periodically reviews all client accounts. All accounts are reviewed by David Harden who is the portfolio manager, usually on a daily basis but at least monthly and quarterly.
- B. Investors in the mutual fund receive their monthly account statements directly from their respective custodians. SGI will not be providing any additional reporting to investors in the mutual fund.

## Item 14 - Client Referrals and Other Compensation

- A. SGI does not receive any economic benefit from any party for providing investment advice to our clients. The only compensation we receive is the investment management fee that our clients pay us.

- B. SGI does not currently compensate any third party for providing client referrals, directly or indirectly. Should SGI enter into an agreement with any third party solicitors and compensate them for new client referrals this may create a conflict interest.

## **Item 15 - Custody**

SGI has custody of client assets due to the direct withdrawal of our advisory fees from client accounts, although we do not have direct custody of client assets or securities. Clients will receive statements on a monthly or quarterly basis directly from the custodian account statements. These statements should be carefully reviewed from the custodian.

## **Item 16 - Investment Discretion**

Summit Global Investments receives discretionary authority from the client through an executed investment advisory agreement at the outset of an advisory relationship. In all cases, however, such discretion to select the identity and amount of securities to be bought and sold is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, SGI observes the investment policies, limitations and restrictions of the clients for which it advises. Similar to investment policy guidelines, adherence to ERISA regulations is also a primary concern at SGI. If in the future SGI were to accept clients subject to ERISA, we intend to request and review a copy of each ERISA plan's Trust and Plan documents. In the course of normal business activity, SGI does not engage in the type of transactions contemplated by the prohibited transaction provisions of ERISA other than those for which there is exemptive relief under ERISA. With respect to the mutual fund and any future clients that are registered investment companies, SGI's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to SGI in writing preferably as part of the executed investment advisory agreement.

## **Item 17 - Voting Client Securities**

SGI has the authority to vote securities on behalf of its current client, a mutual fund. Investors in the fund do not have the authority to direct SGI how to vote portfolio securities. SGI's proxy voting policies and procedures are designed to identify potential conflicts of interest and ensure that proxies are voted in the best interest of clients. Proxies are reviewed on a case-by-case basis to determine the impact on the portfolio of the mutual fund. Any person involved in SGI's proxy voting process must disclose any potential conflict of interest in which he or she is aware. Clients may obtain a copy of SGI's proxy voting policies and procedures and information about how the firm voted by contacting SGI at 888-251-4847.

## **Item 18 - Financial Information**

Registered investment advisers are required in this Item to provide our clients with certain financial information or disclosures about SGI's financial condition. SGI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

## Item 19 - Requirements for State-Registered Advisers

### A. EDUCATION AND BUSINESS STANDARDS

All individuals that offer advice on behalf of the Registrant must have earned an under-graduate college degree and/or have substantive investment related experience. In addition, all such individuals shall have attained all required investment-related licenses and/or designations.

### EDUCATION AND BUSINESS BACKGROUND

As of the date of this filing, David Harden, Mark Kenison and Bryce Sutton are the principal executive officers and management persons of SGI.

#### **David Harden – Chief Executive Officer and Managing Partner**

*Year of Birth: 1972*

*Formal Education After High School:*

- ☐ Southern Utah State College 1990
- ☐ Salt Lake Community College –1993-1995
- ☐ Boston College –1996-1998 (earned a Bachelor of Arts degree)
- ☐ Boston University –1999-2001 (earned a Masters of Computer Science degree)

*Business Background:*

- ☐ Summit Global Investments, President, Senior Portfolio Manager, 2011 – present.
- ☐ Ensign Peak Advisors, Vice President, Senior Portfolio Manager, 2007-2012
- ☐ Presidium Partners, Investment Advisor Representative, 2010 – 2012
- ☐ ICS, Consultant, 2006 - 2007
- ☐ Evergreen Investment, Senior Technology Manager, 2004-2006
- ☐ Harden Software, LLC, 2000-2004
- ☐ Fidelity Investments, various, 1993-2000

#### **Mark Kenison - Chief Operations Officer and Partner**

*Year of Birth: 1971*

*Formal Education After High School:*

- ☐ Utah State University 1993 -1994
- ☐ Salt Lake Community College 1994
- ☐ University of Utah 1995 – 1997 (earned a Bachelor of Arts: Business/Finance degree)

*Business Background:*

- ☐ Summit Global Investments, Chief Compliance Officer, 2011 – present.
- ☐ Turning Point Financial, Owner, President, 2005 – present.
- ☐ Fidelity Investments, Vice President, Private Access, 1995 – 2005

#### **Bryce Sutton - Director of Sales and Partner**

*Year of Birth: 1970*

*Formal Education After High School:*

- ☐ Brigham Young University 1988 – 1990 & 1994 - 1996 (earned a Bachelor of Arts: Political Science degree)

*Business Background:*

- ☐ Summit Global Investments, LLC, Partner, Director of Sales, 2011 - Present
- ☐ LC Advisors, Vice President, Sales 5/2011 – 11/2011
- ☐ Kotak Mahindra, Inc, Vice President, Sales, 2007 – 2011
- ☐ Lynch, Jones & Ryan, Inc., Sales – 2000 – 2007

- ☐ SIFE, Inc., Wholesaler, Sales – 1998 – 2000.
- ☐ Morgan Stanley, Financial Advisor, Sales – 1996 – 1998.

B. Mark Kenison remains employed by Turning Point Financial as President. Turning Point Financial is a North Carolina state registered investment advisory firm that offers financial planning and asset management services to clients. Mark continues to spend approximately 40 hours per week with Turning Point Financial and approximately 20 hours per week with SGI.

C. Neither SGI, nor its management persons, is compensated for advisory-services with performance based fees.

D. Neither SGI, nor its management persons have ever been involved in any legal or disciplinary events that would be material to the evaluation of this advisory business or the integrity of SGI's management persons.

E. Neither SGI, nor its management persons have any relationship with any issuer of securities not listed in the disclosure for Item 10.C.



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**Item 1.B. Cover Page**

David L. Harden

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Date: June 20, 2012

This brochure supplement provides information about **David L. Harden** that supplements the Summit Global Investments brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer Mark Kenison at 888-251-4847 if you did not receive SGI's brochure or if you have any questions about the contents of this supplement.

Additional information about Summit Global Investments also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

### EDUCATION AND BUSINESS BACKGROUND

#### David Harden

*Year of Birth:* 1972

#### *Formal Education After High School:*

- ☐ Southern Utah State College 1990
- ☐ Salt Lake Community College –1993-1995
- ☐ Boston College –1996-1998
- ☐ Boston University –1999-2001

#### *Business Background:*

- ☐ Summit Global Investments, President, Senior Portfolio Manager, 2011 – present.
- ☐ Ensign Peak Advisors, Vice President, Senior Portfolio Manager, 2007-2012
- ☐ Presidium Partners, Investment Advisor Representative, 2010 – 2012
- ☐ ICS, Consultant, 2006 - 2007
- ☐ Evergreen Investment, Senior Technology Manager, 2004-2006
- ☐ Harden Software, LLC, 2000-2004
- ☐ Fidelity Investments, various, 1993-2000

## Item 3 – Disciplinary Information

David Harden has never had any disciplinary actions including but not limited to criminal or civil actions, administrative proceedings before the SEC or any other federal or state regulatory agency or self-regulatory organization.

## Item 4 – Other Business Activities

No information applicable to this item.

## Item 5 – Additional Compensation

SGI receives no additional compensation other than asset management fees from client accounts.

## Item 6 - Supervision

David Harden is solely responsible for giving investment advice to clients. No person can be considered responsible for supervision of the advice given. However, Mr. Harden is required to document conversations with clients concerning investment advice and such documentation is retained in client files. These files are reviewed by the Chief Compliance Officer on a quarterly basis. Additionally, Mr. Harden is subject to the firm's compliance policies and procedures. On quarterly basis, he must attest to periodic reviews, trading reviews and to compliance with the firm's policies, procedures and the Code of Ethics, and is supervised by Mark Kenison, SGI's Chief Compliance Officer. Mark Kenison can be reached at (704) 243-4222.

## Item 7 – Requirements for State Registered Advisers

David Harden is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of them. David Harden has no information applicable to this item.



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Mark L. Kenison

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Date: June 20, 2012

This brochure supplement provides information about **Mark L. Kenison** that supplements the Summit Global Investments brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer Mark Kenison at 888-251-4847 if you did not receive SGI's brochure or if you have any questions about the contents of this supplement.

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## Item 2 - Educational Background and Business Experience

### EDUCATION AND BUSINESS BACKGROUND

#### **Mark Kenison**

*Year of Birth: 1971*

*Formal Education After High School:*

- ☐ Utah State University 1993 -1994
- ☐ Salt Lake Community College 1994
- ☐ University of Utah 1995 – 1997 (Earned Bachelor of Arts: Business degree)

*Business Background:*

- ☐ Summit Global Investments, Chief Compliance Officer, 2011 – present.
- ☐ Turning Point Financial, Owner, President, 2005 - Present
- ☐ Fidelity Investments, Vice President, Private Access, 1995 – 2005

## Item 3 – Disciplinary Information

Mark Kenison has never had any disciplinary actions including but not limited to criminal or civil actions, administrative proceedings before the SEC or any other federal or state regulatory agency or self-regulatory organization.

## Item 4 – Other Business Activities

Mark Kenison remains employed as President and owner of Turning Point Financial, a North Carolina state registered investment advisory firm. Mr. Kenison will continue to spend approximately 40 hours per week with Turning Point Financial and 20 hours per week with SGI. There is no business relationship between Turning Point Financial and SGI. Mr. Kenison may on occasion refer a client from Turning Point Financial to SGI for single-equity investment management, in which instance a conflict of interest would exist because Mr. Kenison could be receiving compensation from both SGI and Turning Point Financial from the same client's assets.

Mark is a licensed insurance agent and is contracted with many insurance companies including Genworth, Aviva, Mutual of Omaha, Blue Cross Blue Shield of North Carolina, Humana, United Commercial Travelers, Cigna, John Hancock, Banner Life, and Assurant. There is no business relationship between Mr. Kenison's insurance business and SGI and he will not be offering any insurance products to clients of SGI. If SGI were to sell an insurance product to a client a conflict of interest would exist due to Mr. Kenison being an insurance agent. He could stand to benefit from the sale of an insurance product to an SGI client. Mr. Kenison may at times recommend SGI to clients of Turning Point Financial, in which case a conflict of interest would exist

## Item 5 – Additional Compensation

SGI receives no additional compensation other than asset management fees from client accounts.

## Item 6 - Supervision

Mark Kenison serves as the Chief Compliance Officer for Summit Global Investments. David Harden serves as the CEO and, as the only current asset manager, supervises advice given to clients. If Mr. Kenison were to give investment advice to clients, it would be supervised by Mr. Harden. Mr. Harden can be reached at (888) 251-4847. Mr. Kenison is required to document conversations with clients

concerning investment advice and such documentation is retained in client files. Additionally, Mr. Kenison is subject to the firm's compliance policies and procedures. On quarterly basis, he must attest to periodic reviews, trading reviews and to compliance with the firm's policies, procedures and the Code of Ethics.

### **Item 7 – Requirements for State Registered Advisers**

Mark Kenison is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of them. Mark Kenison has no information applicable to this item.



**Form ADV Part 2B  
Brochure Supplement**

**Item 1.B. Cover Page**

Bryce Sutton

Summit Global Investments  
620 South Main Street  
Bountiful, UT 84010

Phone & Fax: 888-251-4847

Website: [www.summitglobalinvestments.com](http://www.summitglobalinvestments.com)

Date: June 20, 2012

This brochure supplement provides information about **Bryce Sutton** that supplements the Summit Global Investments brochure. You should have received a copy of that brochure. Please contact our Chief Compliance Officer Mark Kenison at 888-251-4847 if you did not receive SGI's brochure or if you have any questions about the contents of this supplement.

Additional information about Summit Global Investments also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

### EDUCATION AND BUSINESS BACKGROUND

#### **Bryce Sutton- Director of Sales and Partner**

*Year of Birth: 1970*

*Formal Education After High School:*

- ☐ Brigham Young University 1988 – 1990 & 1994 - 1996 (earned a Bachelor of Arts: Political Science degree)

*Business Background:*

- ☐ Summit Global Investments, LLC, Partner, Director of Sales, 2011 - Present
- ☐ LC Advisors, Vice President, Sales 5/2011 – 11/2011
- ☐ Kotak Mahindra, Inc., Vice President, Sales, 2007 – 2011
- ☐ Lynch, Jones & Ryan, Inc., Sales – 2000 – 2007
- ☐ SIFE, Inc., Wholesaler, Sales – 1998 – 2000.
- ☐ Morgan Stanley, Financial Advisor, Sales – 1996 – 1998.

## Item 3 – Disciplinary Information

Bryce Sutton has never had any disciplinary actions including but not limited to criminal or civil actions, administrative proceedings before the SEC or any other federal or state regulatory agency or self-regulatory organization.

## Item 4 – Other Business Activities

Bryce Sutton has no other business activities to disclose at this time.

## Item 5 – Additional Compensation

SGI receives no additional compensation other than asset management fees from client accounts.

## Item 6 - Supervision

David Harden serves as the CEO and, as the only current asset manager, supervises advice given to clients. If Mr. Sutton were to give investment advice to clients, it would be supervised by Mr. Harden. Mr. Harden can be reached at (888) 251-4847. Additionally, Mr. Sutton is subject to the firm's compliance policies and procedures. On quarterly basis, he must attest to periodic reviews, trading reviews and to compliance with the firm's policies, procedures and the Code of Ethics, and is supervised by Mark Kenison, SGI's Chief Compliance Officer. Mark Kenison can be reached at (704) 243-4222.

## Item 7 – Requirements for State Registered Advisers

Bryce Sutton is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of them. Bryce Sutton has no information applicable to this item.