

SUMMIT WEALTH PARTNERS, Inc.  
[www.MySummitWealth.com](http://www.MySummitWealth.com)

800 North Magnolia Avenue, Suite 105  
Orlando, Florida 32803  
407-656-2252  
866-977-2252

9045 Strada Stell Court, Suite 101  
Naples, FL 34109  
239-254-1875  
866-370-2330

4223 Duval Drive  
Jacksonville Beach, Florida 32250  
904-273-4550  
877-324-5304

PART 2A OF FORM ADV  
FIRM BROCHURE  
March 10, 2014

This brochure provides information about the qualifications and business practices of Summit Wealth Partners, Inc. (“Summit”). If you have any questions about the contents of this brochure, please contact us at 407-656-2252. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Summit is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Summit’s CRD number is 134620.

## Item 2 - MATERIAL CHANGES

No material changes have been made since our last brochure dated March 1, 2013 except that:

(1) We have changed our Naples office location to 9045 Strada Stell Ct., Suite 101, Naples, FL 34109. We urge you to stop by and see our new office if you have not already done so.

Our Brochure may be requested by contacting Chad A. Warrick, our Senior Wealth Advisor and Chief Compliance Officer at 407-656-2252 or by emailing him at [compliance@mysummitwealth.com](mailto:compliance@mysummitwealth.com)

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Brochure Supplements for Investment Advisor Representatives in  
Summit Offices in Orlando, Naples, and Jacksonville, Florida.

## Item 4 - ADVISORY BUSINESS

### OUR FIRM

Summit Wealth Partners, Inc. (“Summit”) is an independent, privately owned firm in the wealth management business. Summit is 100% owned by Investors Advocate LLC, a financial services holding company that is 100% owned by Dr. Mitchell Levin, Chad Warrick and Jason Print. Dr. Levin is Summit’s CEO and Managing Director. Mr. Warrick is our Senior Wealth Advisor, Chief Investment Officer and Chief Compliance Officer. Mr. Print is our Senior Wealth Advisor and Portfolio Manager. We would be glad to speak with you about Summit at any time. We can be reached at any of our offices by telephone.

As of December 31, 2013 we managed approximately \$274,000,000 of client assets. Of this total amount, approximately \$254,500,000 was managed on a discretionary basis and \$19,500,000 on a non-discretionary basis. We also manage Assets Under Advisement in programs where Summit provides Model Portfolios but has no discretion to effect trades and no supervisory responsibility over the assets in the program. The precise amount of assets under management and/or advisement will fluctuate daily due to market and client activities.

### OUR SERVICES

Summit provides wealth management and investment management services to individuals, charitable organizations, trusts, foundations, pension and profit-sharing plans and business entities. We also provide investment management services by constructing Model Portfolios for sponsors of Unified Managed Account platforms. Our Investment Adviser Representatives provide our wealth management and investment management services. Information about each of our Investment Adviser Representatives is available in our “Supplemental Brochures.”

### OUR SERVICES - WEALTH MANAGEMENT

Our wealth management process involves defining financial and life goals and creating investment strategies designed to achieve the desired results based on the client's particular circumstances. We offer investment management, financial planning and other customized advisory services depending on a client’s personal needs. Our investment management services focus on managing financial assets. Our financial planning services encompass retirement planning, educational planning, tax planning, risk management and estate planning. Each client individually decides which services they will receive.

The investment process begins with selecting an investment strategy. The client’s investment strategy will reflect the client’s investment objectives, risk tolerance and any investment restrictions that are desired.

Summit usually is given the discretion and authority to manage client investment accounts. This means Summit is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased or sold, the amount of securities to be purchased or sold, the broker/dealer to be used and the commission rates to be paid. Summit actively manages each investment account as changes in issuer and market conditions and client circumstances may require.

Summit also provides non-discretionary investment management services. In providing non-discretionary services, Summit will obtain the approval of the client before executing a trade. Such services may include additional fees because of the additional costs involved.

Financial planning is primarily an analytical process designed to organize financial data, identify needs and opportunities and evaluate alternative courses of action. A financial plan may discuss current net worth, income tax issues, cash flow and budgeting strategies, specific investments and asset allocations, retirement planning, employee benefit plan analysis, estate and gift tax planning, education pre-funding and risk management focusing on life, health and disability coverage.

The goal is to develop a plan strategy for the successful management of personal income, assets, and liabilities in meeting the client's financial goals and lifetime objectives. Depending on individual preferences some form of written plan may be produced as part of the wealth management process. We also offer financial planning services as a distinct product independent of our other wealth management services.

This is a general description of our wealth management process. Because each individual is unique this general description does not discuss the many individual issues and factors that may be involved in our wealth management process for specific clients. For example, some clients are involved in funding charitable activities while others are not. Every client is advised that they should promptly notify us of all material changes in their financial situation or investment objectives.

## OUR SERVICES – INVESTMENT MANAGEMENT

In addition to its wealth management services, Summit also provides other investment management services. We offer our investment strategy and portfolio modeling services through intermediary-specific managed account platforms. In these cases, the other advisor is contracted by the client for investment management services and uses Summit investment models, asset allocation strategies and rebalancing discipline to manage the contracted investors' accounts. Summit's role is limited to providing our proprietary investment strategies, training on those strategies, any updates to those strategies and marketing and sales support. Investment managers and service providers include PlaceMark Investments ("PlaceMark"). PlaceMark may further offer Summit's strategies to other brokerage firms and investment advisory firms via their private-label "Investment Manager Marketplace" or Unified Managed Account Program ("UMAP") services. Summit retains the right to approve or decline being included on any additional platforms.

Summit offers an asset allocation modeling solution designed to provide a disciplined approach through strategic indexing and active portfolio management. Summit recommends portfolios consisting primarily of exchange traded funds (ETF). We call our asset allocation modeling solutions “True Market™ Models.” True Market™ Models focus on the risk perspective first. Managing volatility and concentrating on risk-adjusted performance is crucial. Our Investment Management Committee (IMC) researches risks and validates opportunities worldwide, in all sectors and industries, through the lens of current and anticipated market conditions. The True Market™ Models website is located at [www.TrueMarketModels.com](http://www.TrueMarketModels.com).

At the core of the True Market™ Models investment process evidence shows that asset allocation is the key to reducing volatility, to achieving long-term performance, and to best addressing the advisor’s responsibility for managing client assets.

Our rules-based disciplines provide higher-level performance through direct exposure and precision targeting for credit, quality, and duration on the fixed income side and minimize or eliminate style drift, and maximize efficiency and transparency on the equity side. Our staunch and disciplined approach in managing to our strategies keeps them on track to perform as designed.

#### Conservative CORE Strategy

Strategy Description: The True Market™ Core Conservative Strategy is a risk targeted, multi-asset class strategy, diversified across global equities, fixed income, and commodities. It is based upon years of experience now being implemented in a new enhanced method. The strategy is designed for investors looking to maintain long-term purchasing power that can tolerate a minimal amount of volatility pursuant to the investor’s risk tolerance. The strategy’s goal is to achieve stable long-term appreciation with an emphasis on dividend and minimum volatility securities to curtail downside risk. The strategy is actively & systematically re-balanced to its target allocation of 36% equities to 64% fixed income.

#### Moderate CORE Strategy

Strategy Description: The True Market™ Core Moderate Strategy is a risk targeted, multi-asset class strategy, diversified across global equities, fixed income, and commodities. It is based upon years of experience now being implemented in a new enhanced method. The strategy is designed for investors seeking current income & portfolio growth that can tolerate a moderate amount of volatility pursuant to the investor’s risk tolerance. The strategy’s goal is to achieve stable long-term appreciation with an emphasis on dividend and minimum volatility securities to curtail downside risk. The strategy is actively & systematically re-balanced to its target allocation of 51% equities to 49% fixed income.

#### Growth CORE Strategy

Strategy Description: The True Market™ Core Growth Strategy is an alpha-targeted, multi-asset class strategy. The strategy is designed for investment growth with an increased emphasis on small, micro & mid cap as well as international equities in order to seek higher alpha returns. We have further broadened our international exposure with the inclusion of “frontier markets,” which we believe offers the greatest opportunity for growth comparable to what has been witnessed in the emerging markets space over the last decade and a half.

The strategy is actively & systematically re-balanced to its target allocation of 68% equities to 32% fixed income.

Aggressive Growth CORE Strategy

Strategy Description: The True Market™ Core Aggressive Strategy is an alpha-targeted, multi-asset class strategy. The strategy is designed for investment growth with an increased emphasis on small, micro & mid cap as well as international equities in order to seek higher alpha returns. We have further broadened our international exposure with the inclusion of “frontier markets,” which we believe offers the greatest opportunity for growth comparable to what has been witnessed in the emerging markets space over the last decade and a half. The strategy is actively & systematically re-balanced to its target allocation of 88% equities to 12% fixed income.

## ITEM 5 - FEES AND COMPENSATION

### FEES FOR OUR WEALTH MANAGEMENT SERVICES

Summit’s annual fees may be billed monthly or quarterly in arrears or advance based on the fair market value of the assets under management on the last day of the month. Fees are assessed pro rata if our services commence on any date other than the first day of a calendar month. Our *standard* annual fees vary between 0.75% and 2.00% depending upon the assets under management and the specific services provided. In limited circumstances and in our discretion, our advisory fees may be negotiated with the client or bundled. Negotiated fee schedules vary based on the type of client, investment objectives, account size and individual circumstances. Finally, some legacy accounts may have different fee provisions.

Summit may allow investment accounts of members of the same household to be aggregated for purposes of determining annual fees. For example, we may allow such aggregation when we separately manage investment accounts for the minor children of current clients.

Summit also provides financial planning services on an engagement basis at rates that are determined by the scope of the engagement. Note that as a fee-only firm, neither Summit itself, nor any Summit employee receives commissions on securities transactions.

Our fees are stated in the Financial Services Agreement each client signs. This Agreement defines our relationship with the client. It describes the services we will provide and the client’s obligations to us. A new client may terminate a Financial Services Agreement within five days of the date of acceptance without any cost to the client. After the five-day period, either party may terminate the agreement by providing written notice to the other party. The client will incur a pro rata charge for bona fide services rendered during the term of the Financial Services Agreement. If there are any prepaid unearned fees, we will promptly refund a pro rata share to the client.



## FEES FOR OUR INVESTMENT MANAGEMENT SERVICES

Fees for our investment management services provided through intermediary-specific managed account platforms are included in the fees charged by the firm offering the managed account platform.

## PAYMENT FOR WEALTH MANAGEMENT SERVICES

The client may select to be directly billed for our services or to have the custodian for the investment account deduct our fees from the investment account. The client must provide written authorization permitting Summit to bill the custodian for Summit's fees if our fees are going to be directly debited from a client's custody account. In addition, the account must be held by a qualified independent custodian and the qualified custodian must agree to send to the client an account statement each calendar quarter. Each quarterly account statement must indicate all amounts disbursed from the account including fees paid directly to Summit. Clients are informed that it is their responsibility to verify the accuracy of the custodian statement and fee calculation. The investment account custodian will not determine whether the fee is properly calculated.

## GENERAL INFORMATION ON FEES

**Negotiability of Fees:** In certain circumstances, Summit's fees may be negotiable.

**Fee Calculation:** The fee is not charged on the basis of a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

**Termination of Advisory Relationship:** An advisory agreement may be canceled at any time, by the client, for any reason upon receipt of written notice and by Summit, for any reason, upon 10 days prior written notice. Upon termination of any account, any unpaid earned fees will be due and payable and may be billed to the client through the mail.

**Mutual Fund and ETF Fees and Expenses:** All fees paid to Summit Wealth Partners for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or ETFs to their shareholders. These fees and expenses are described in each investment product's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee.

Clients should review both the fees charged by the investment products and the fees charged by Summit to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Clients may also elect to be billed directly for fees or to authorize Summit to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar month (with the exception of de minimis contributions and withdrawals.)

## TRADING AND OTHER COSTS

Our wealth management fees are separate and distinct from transaction fees charged by broker dealers associated with the trading of securities in investment accounts. Such fees may include commissions, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Please see the section entitled “Brokerage Practices” for more information about broker/dealer practices.

Our investment advice often involves investing in pooled investment vehicles such as mutual funds and exchange traded funds. Our wealth management fees are separate and distinct from the fees and expenses charged by such funds. These fees will generally include a management fee and other fund expenses. They are explained in the offering documents for each fund.

## Item 6 - PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Performance based fees are based on a share of capital gains on or capital appreciation of the assets in an investment account. Summit does not charge any performance based fees or engage in the practice known as side-by-side management.

## Item 7 - TYPES OF CLIENTS

Summit offers personalized wealth management and investment management services to individuals. We generally require a minimum of \$500,000 per household or family relationship to open and maintain individual investment management accounts. We may waive this minimum requirement based on the facts and circumstances. For example, we might waive the minimum requirement for a person referred by an existing client or for a client who wants to evaluate our services.

We also provide investment management services directly to other types of clients such as charitable organizations, trusts, foundations, pension and profit-sharing plans and business entities. These are generally referred to as institutional clients. There are no account minimums for institutional clients.

Finally, we also provide investment management services indirectly to other Registered Investment Advisers and Broker/Dealers through our participation as a Model Portfolio Adviser in the PlaceMark UMA platform.

As stated in item 5, Summit also provides financial planning services on an engagement basis. There is no minimum account size requirement for such services.

## Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### TYPES OF INVESTMENTS

We may offer Investment advice on any investments held by a client at the start of the advisory relationship. Recommendations for new investments may include domestic and foreign debt and equity securities, United States municipal and government securities, pooled investment vehicles such as mutual funds and exchange traded funds, publicly traded real estate investment trusts (REITS), direct participation programs such as limited partnerships, exchange traded options and cash management products. We do not offer or recommend or fee upon or receive commissions from “private offerings,” private equity investments, or hedge funds.

### INVESTMENT STRATEGIES

Summit believes in efficient markets and strategic index management as a means of taking advantage of those efficiencies. Summit typically looks for pure asset-class investment vehicles with which to build efficient and low cost portfolios. Summit uses low cost asset-class and/or index mutual funds to structure certain portfolios. Exchange Traded Funds (“ETFs”) and Exchange Traded Notes (“ETN’s”) (referred to collectively herein as “ETFs”) also provide such investment vehicles. Summit will use certain ETFs to construct certain portfolios. Summit will typically limit its use of “Exchange Listed Securities” to ETFs and closed end, passively managed funds.

Client portfolios may also include individual securities (Stocks, Bonds and Options.) Summit may utilize different investment strategies, based upon the needs of the client, including long-term purchases, short-term purchases and option writing.

Summit, from time to time, ladder Certificates of Deposit or US Government Securities for some clients as a means of protecting principal in order to make capital available for future purchases in dollar cost averaging strategies or the like.

Summit utilizes mainstream investment theories, principles, and modeling techniques. These include, but are not limited to Modern Portfolio Theory, Efficient Markets Hypothesis and the Fama-French Three Factor Model. We believe asset allocation is the primary driver of investment portfolio performance; that risk and expected return are correlated; and, that diversification is essential in managing risk. We monitor macro- economic data and interpretive data related to investors’ current appetite to take on or reduce investment risk. These factors are used to fine tune strategic asset allocation models and increase or decrease slightly our portfolios’ exposures to asset classes that we feel will be affected by current economic or market conditions.

Active asset allocation and an investment in the model portfolio involve market risk and an investment in a model portfolio could lose money over short or even long periods. Trading can affect investment performance, particularly through increased brokerage costs and taxes.

Summit may use research and analytical tools purchased from Bloomberg, Morningstar, Blackrock, internally produced proprietary programs, web-based analytical tools and various industry publications. Portfolio model construction is based on academic research and regression analysis (back testing). Certain index and other data are obtained through Bloomberg, Morningstar, and other subscription data providers. Summit primarily utilizes the concepts put forth by Modern Portfolio Theory and the Fama/French Three Factor Model.

## SECURITY ANALYSIS

The security analysis methods employed by Summit may include fundamental, technical, charting and cyclical analysis depending on the type of analysis being conducted.

## SOURCES OF INFORMATION

In conducting security analysis, Summit may utilize the following sources of information: financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the U.S. Securities and Exchange Commission, other comparable sovereign agencies and company press releases.

## RISK

Investing in financial instruments involves risk of loss that each client must accept. Typical investment risks include market risk typified by a drop in a security's price due to a company specific event (e.g. unsystematic risk), or general market activity (e.g., systematic risk). In addition, certain strategies may impose more risk than others. For example, with fixed income securities, a period of rising interest rates could erode the value of bond since bond values generally fall as bond yields rise. Investment risk with international securities also includes fluctuation in currency values, differences in accounting practices and economic and political instability. We do not represent, warrant, or imply that our investment management services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or avoid losses.

In this item 8 we are providing a brief explanation of material risks. We often use pooled investment vehicles as a significant investment strategy. We are not duplicating the risk disclosures contained in the prospectuses or other offering documents for pooled investment vehicles. Please refer to the prospectus, offering memoranda or other documents issued by the pool for a more detailed discussion of risks.

## EXCHANGE TRADED FUNDS (ETFs)

The ETFs utilized by Summit may include ETFs invested in domestic and international equities, including preferred equities and Real Estate Investment Trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization and small capitalization stocks.

Risk of loss: the prices of the common stocks, other securities or commodities held by the ETFs may decline (and the ETF price may in turn decline) in response to certain events taking place around the world, including those directly involving the issuers whose securities are owned by the ETF; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; governmental or governmental agency responses to economic conditions; and currency, interest rate and commodity price fluctuations.

Certain ETFs utilized by Summit may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility, as more fully described in the respective ETF prospectus. These risks may be greater with investments in developing countries, commonly referred to as Emerging Markets.

Certain ETFs utilized by Summit may invest in lower rated fixed income securities. ETFs invested in lower rated bonds are subject to greater fluctuations in value and risk of loss of income and principal than higher rated bonds. The return of principal for the bond holdings in ETFs is not guaranteed. ETF shares are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

ETFs are subject to market fluctuations and involve the risk of loss that clients must be prepared to bear. Clients should carefully consider the investment objectives, risks and expenses of the various ETFs utilized by Summit. This and other important information is contained in each ETFs summary prospectus and prospectus, which can be obtained directly from your account custodian.

## OPTIONS

There are numerous risks associated with transactions in options on securities or securities indexes. A decision as to whether, when and how to use options involves the exercise of skill and judgment, and even a well-conceived transaction may be unsuccessful to some degree because of market behavior or unexpected events. As the writer of covered call options, the client forgoes, during the option's life, the opportunity to profit from increases in the market value of the underlying security or the index above the sum of the option premium received and the exercise price of the call, but has retained the risk of loss, minus the option premium received, should the price of the underlying security decline. In the case of index options, the client incurs basis risk between the performance of the underlying portfolio and the performance of the underlying index. For example, the underlying portfolio may decline in value while the underlying index may increase in value, resulting in a loss on the call option while the underlying portfolio declines as well.

## REAL ESTATE INVESTMENT TRUSTS (REITS)

The value of shares in publicly traded REITs will fluctuate. An investor who sells shares in a REIT could receive more, or less, than the original purchase price. Factors that can influence market risk include the general level of real estate property values, which tend to rise and fall with current market conditions. As with any active business, management skills are very important. Also, shares of REITs, especially mortgage REITs, are sensitive to changes in the general level of interest rates. Mortgage REITs respond much like bonds, generally increasing in value as interest rates fall and decreasing in value if interest rates rise.

## CASH MANAGEMENT

Cash is invested in a money market fund, sweep account or similar cash management product.

## Item 9 - DISCIPLINARY HISTORY

Summit must disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of their services or the integrity of their management. Neither Summit, nor any of its Investment Advisory Representatives, have any reportable disciplinary events to disclose.

## Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Certain Investment Adviser Representatives associated with Summit, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully disclosed commission basis, the purchase of certain insurance products. While Summit does not sell such insurance products to its investment advisory clients, Summit does permit these Investment Adviser Representatives, in their individual capacities as licensed insurance agents, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that any compensation for any services puts the provider at odds with the client. It is in the provider's interest to provide services in exchange for compensation. However, it is in the recipient's interest to pay compensation for value received.

Summit is affiliated with Investors Advocate LLC and Summit Asset Protection Group LLC. Summit Asset Protection Group LLC is involved in the marketing of insurance products on a commission basis. Summit Asset Protection Group may recommend, market or sell insurance products to Summit clients. Summit Asset Protection Group is 51% owned by Summit Wealth Partners, Inc. Some Summit employees are sequentially employed by Summit Asset Protection Group, which is also housed in Summit's Orlando offices. These "dual" employees, or the Summit Asset Protection Group itself, may receive commissions from products purchased by Summit clients.

No client is under any obligation to purchase insurance products from Summit Asset Protection Group LLC. Summit's recommendation that a client engage the services of Summit Asset Protection Group LLC presents a potential conflict of interest. Any questions regarding this conflict of interests should be directed to Summit's Chief Compliance Officer.

#### OTHER OUTSIDE BUSINESS ACTIVITIES

Dr. Levin is involved in several family owned, personal estate planning limited liability companies and family limited partnerships.

### Item 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

#### CODE OF ETHICS

Summit has adopted a Code of Ethics for all employees. In brief, the Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items and personal securities trading procedures, among other things. All employees must annually acknowledge their understanding of the Code of Ethics.

#### PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Summit's employees may purchase, sell or hold for their personal accounts securities similar or identical to those recommended to clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of Summit's employees will not interfere with (i) making decisions in the best interests of our clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions.

Clients may request a copy of our Code of Ethics at any time. A client might wonder why we do not simply include our Code of Ethics in this brochure. The reason is that this brochure is supposed to be a narrative document written in plain English. Because of the inherent technical complexities of securities and the securities markets our Code of Ethics is a formal, complex and lengthy legal document that is not written in plain English.



## Item 12 - BROKERAGE PRACTICES

### BROKER SELECTION

Summit generally has the authority to determine the broker dealer to be used and the commission rates paid. Summit will generally recommend that clients utilize the brokerage and clearing services of TD Ameritrade, Inc., Charles Schwab & Co., Inc. or Fidelity.

### BEST EXECUTION

Best execution is generally defined as the “execution of securities transactions for clients in such a manner that the client’s total cost or proceeds in each transaction is the most favorable under the circumstances.” The best execution responsibility applies to the circumstances of each particular transaction and an investment adviser must consider the full range and quality of a broker-dealer’s services, including, among other things, execution capability, commission rates, the value of any research, financial responsibility and responsiveness. Summit will seek competitive rates but we may not obtain the lowest possible commission rates for client transactions.

### SPECIFIC DISCLOSURE CONCERNING TD AMERITRADE

Summit participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (“TD Ameritrade”), member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors such as Summit services that include custody of securities, trade execution, clearance and settlement of transactions. Summit receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under item 14.)

### SPECIFIC DISCLOSURE CONCERNING FIDELITY

Summit may recommend that clients establish brokerage accounts with Fidelity Brokerage Services LLC to maintain custody of clients’ assets and to effect trades for their accounts. Summit is independently owned and operated and not affiliated with Fidelity. (Please see the disclosure under item 14.)

### SPECIFIC DISCLOSURE CONCERNING SCHWAB

Summit may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab) to maintain custody of clients’ assets and to effect trades for their accounts. Summit is independently owned and operated and not affiliated with Schwab. (Please see the disclosure under item 14.)



## AGGREGATION OF ORDERS

Summit will aggregate orders with respect to a security if such aggregation is consistent with achieving best execution for the various client accounts. When orders are aggregated, each participating account receives the average share price for the transaction and bears a proportionate share of all transaction costs, based upon each account's participation in the transaction, subject to Summit's discretion depending on factual or market conditions and the duty to achieve best execution for client accounts. Clients participating in block trading may include proprietary or related accounts. Such accounts are treated as client accounts and are neither given preferential nor inferior treatment versus other client accounts. Summit does not receive additional compensation or remuneration of any kind because of the aggregation of client trades.

Allocations of orders among client accounts must be made in a fair and equitable manner. Generally, allocations among accounts with the same or similar investment objective are made pro rata based upon the size of the accounts. There is no allocation to an account or set of accounts based on account performance or the amount or structure of management fees. However, the following factors may justify an allocation that deviates from the general rule:

1. Specific allocations may be chosen based upon an account's existing positions in securities.
2. Specific allocations may be chosen because of the cash availability of one or more particular accounts.
3. Specific allocations may be chosen based on a partial fill of the block trade.
4. Specific allocations may be chosen for tax reasons.

## Item 13 - REVIEW OF ACCOUNTS

Summit assigns each client investment account to one of our Investment Adviser Representatives. Each account is defined to one or more investment strategies as described in item 4, above. Our Investment Adviser Representatives regularly review each strategy with support from our Investment Management Committee. Our Investment Management Committee meets at least quarterly or more frequently depending on market conditions to evaluate our investment strategies.

We monitor client accounts on a continuous and best efforts basis and conduct formal reviews with our clients as specified in the client's Financial Services Agreement. Factors that might suggest an account review in addition to the annual review include, but are not limited to, the following: changes in investment strategy, large deposits or withdrawals from the account and changes in the client's financial situation.

## REPORTS TO CLIENTS

Clients receive monthly investment account statements directly from their custodian and quarterly performance reports directly from Summit. Clients are able to review their investment accounts at any time on their custodian's secure website.

## Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Summit does not receive any economic benefits such as sales incentives or prizes from non-clients for providing investment advice. Summit does not use solicitors or pay client referral fees to any person who is not a Summit employee except in the case of pension and profit sharing plan engagements where independent third-party consultants are involved.

## TD AMERITRADE DISCLOSURE

As disclosed under item 12, Summit participates in TD Ameritrade's institutional customer program and Summit may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Summit's participation in the program and the investment advice we give to our clients although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a specific trading desk; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Summit by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Summit's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Summit but may not benefit our client accounts.

These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business. The benefits received by Summit or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Summit endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Summit or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Summit's choice of TD Ameritrade for custody and brokerage services.

## FIDELITY DISCLOSURE

Summit has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides Summit with Fidelity's "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like Summit in conducting business and in serving the best interests of their clients but that may benefit Summit.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables Summit to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, Fidelity also makes available to Summit, at no additional charge to Summit, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by Summit (within specified parameters). These research and brokerage services presently include services such as Client statements and confirmations; research related products and tools; consulting services; access to a specific trading desk; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and are used by Summit to manage accounts for which Summit has investment discretion.

Summit may also receive additional services which may include but not limited to business and marketing consultations, practice valuation and other practice management solutions. Without this arrangement, Summit might be compelled to purchase the same or similar services at its own expense.

As a result of receiving such services for no additional cost, Summit may have an incentive to continue to use or expand the use of Fidelity's services. Summit examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of Summit's clients and satisfies its client obligations, including its duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Summit determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Summit will seek competitive rates, to the benefit of all clients, it 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 Summit will generally be used to service all of Summit's 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. Summit and Fidelity are not affiliates, and no broker-dealer affiliated with Summit is involved in the relationship between Summit and Fidelity.

#### SCHWAB DISCLOSURE

Schwab provides Summit with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon Summit committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to Summit other products and services that benefit Summit but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Summit in managing and administering clients' accounts include software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple clients accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of our fees from our clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting

#### Item 15 - CUSTODY

Custody of client assets will always be maintained with the independent custodian selected by the client. Summit will not have physical custody of any client assets. Summit is permitted to direct the custodian to deduct fees directly from client investment accounts maintained by the custodian. Clients are responsible for paying all fees or charges of the custodian.

Clients will receive quarterly directly from the custodian an account statement showing all transactions occurring in the client's account during the period covered by the account statement and the funds, securities and other property in the client's account at the end of the period. Clients are urged to carefully review the account statement sent by the custodian.

## Item 16 - INVESTMENT DISCRETION

Summit usually is given the discretion and authority to manage client investment accounts. This means Summit is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased or sold, the amount of securities to be purchased or sold, the broker/dealer to be used and the commission rates to be paid. Of course, our discretion must be exercised in a manner consistent with the stated investment objectives, limitations and restrictions for each investment account. Clients authorize Summit to give the custodian instructions by completing a document called a Limited Power of Attorney for the custody account.

Summit also offers non-discretionary investment advice through Unified Managed Accounts where Summit is a Model Portfolio Adviser but has no responsibility for effecting trades on behalf of any client of the Overlay Manager.

Please refer back to item 4 for a discussion of how investment strategies are determined and how clients may specify investment restrictions or limitations for their investment accounts.

## Item 17 - VOTING CLIENT SECURITIES

Summit does not vote proxies on behalf of its clients. Summit directs the custodian to forward directly to the client copies of all proxies and shareholder communications relating to the client's investment assets. Each client tells the custodian how to vote proxies. The client also makes all elections relative to any corporate action notification such as mergers, tender offers, or bankruptcy proceedings. Summit realizes that voting requests range from routine matters to unique situations. If a client has a specific question about a voting matter the client should contact our Chief Compliance Officer for assistance.

## CLASS ACTION SETTLEMENTS

Summit may or may not process client claims in class action lawsuits or similar settlements involving securities owned by the client depending on the specific facts and circumstances. Clients will receive the documentation for class action claims directly from their custodian. Each client should verify with their custodian (or other account administrator) whether such claims are being made on the client's behalf by the custodian or if the client is expected to file such claims directly. If the claim is not being filed by the custodian the client should consult with us to determine what, if any, action should be taken.

## Item 18 - FINANCIAL INFORMATION

Because Summit does not require or accept prepayment of more than \$1,200 in fees six months or more in advance we are not required to include a balance sheet with this disclosure brochure. Summit does not have any material adverse financial conditions to disclose and we have never been the subject of a bankruptcy petition.

## PRIVACY NOTICE

Summit has adopted policies and procedures designed to keep client information private and secure. We do not disclose any nonpublic personal information about our clients or former clients to any nonaffiliated third parties, except at the request of a client or as permitted or required by law. In the course of servicing a client's account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers. We restrict internal access to nonpublic personal information about the client to those persons who need access to that information to provide services to the client and to perform administrative functions. For the full text of our Privacy Policy, please contact our Chief Compliance Officer.