

Summit View Capital Advisors

Part 2A of Form ADV

March 29, 2024

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This brochure provides information about the qualifications and business practices of Summit View Capital Advisors, LLC (“the Adviser”). If you have any questions about the contents of this brochure, please contact us at compliance@sumstrat.com or by calling +1 (720) 608 - 1211. 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.

This brochure is available free of charge and at any time by submitting a request to compliance@sumstrat.com.

Additional information about the Adviser is available on the SEC’s website at www.adviserinfo.sec.gov and at www.sumstrat.com. You may also search for the the Adviser by using its CRD number, which is 306552, on the SEC’s website.

Registration or licensure with the SEC or with a state securities authority does not imply a certain level of skill or training.

Item 2 - Material Changes

Since the last annual version of this brochure, dated March 21, 2023, the following are material changes:

- Item 4: Advisory Business has been amended to reflect current assets under management.
- Item 18: Financial Information has been amended to reflect that the firm does not accept payment of more than \$500 in fees, six months or more in advance.
- Item 19: Requirements for State-Registered Advisers has been added.

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Item 4 - Advisory Business

The Adviser first became registered in February 2022. Roger Bowden is the President, Chief Compliance Officer, and sole shareholder.

The Adviser offers two service programs, Program A and Program B, as detailed throughout this Brochure.

Program A provides active management of client assets with a focus on senior note portfolios, rather than equities, for institutions, individuals, and other entities. During the initial portfolio construction period, and, occasionally thereafter, a client's capital may be invested in one or more mutual funds that are sponsored or managed by third parties.

Program B provides investment consulting advice without direct management or discretion to fiduciaries overseeing diversified portfolios for institutions, individuals and other entities.

Program A and Program B account for certain restrictions, requirements and objectives for each individual client.

The Adviser will not simultaneously provide services associated with Program A and Program B.

As of February 2, 2024 the Adviser does not have any discretionary or non-discretionary assets under management (AUM). The Adviser has \$105,426,866 in assets under advisement that it does not manage.

Item 5 - Fees and Compensation

Program A: Management of Investment Grade Senior Note Portfolios

The specific method that management fees are charged by the Adviser is established in a client's Investment Management Agreement. The Adviser will bill its fees on a quarterly calendar basis in advance using the portfolio's value on the last day of the prior quarter for calculating such fees. Clients authorize the Adviser to either direct a qualified custodian to directly debit fees from their client accounts or the client may elect to be billed directly. Management fees are prorated for each capital contribution and for withdrawals in excess of \$100,000 made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid and unearned fees will be promptly refunded. Any earned and unpaid fees will be due and payable. The suggested fee schedule is below and is negotiable in the Adviser's sole discretion.

<u>Blended Rate Fee Schedule</u>	
First \$1,000,000	0.60%
Next \$5,000,000	0.45%
Next \$5,000,000	0.25%
Thereafter	Negotiable

This is a blended rate table, i.e. fees on assets in each tier are calculated at that tier's rate.

A qualified custodian that is selected by the client will send statements to the client at least quarterly demonstrating all disbursements from the client's account including investment

management fees paid to the Adviser. Clients will receive a quarterly fee statement from the Adviser that will include the methodology used to calculate a quarterly fee.

Refer to Item 15 for details on direct deduction requirements.

The Adviser's fees do not include brokerage/transaction fees, custodian fees or fees charged by other investment Advisers that may be retained by a client. The fees associated with each mutual fund i) are disclosed in each mutual fund's prospectus, ii) are in addition to the above fee table and iii) will reduce the net return to the client.

Program B: Investment Consulting

From time-to-time, the Adviser may accept a fixed fee, fees billed on an hourly basis and/or ongoing quarterly payments ("Consulting Fees") for investment consulting services. Such fee arrangements will be established in an Investment Consulting Agreement and in accordance with a client's written agreement with the Adviser. The fee is dependent on the nature and complexity of the services to be provided by the Adviser. Under no circumstances will the Adviser collect fees for more than six-months in advance. A maximum hourly rate of \$1,200 per hour may be charged for services provided by the Adviser, and may be negotiable at the sole discretion of the adviser. Hourly fees will be described in a monthly statement that is delivered to the client and such fees are payable at the end of each month for the services provided in that month.

Upon termination of an Investment Consulting Agreement, any prepaid and unearned fees will be promptly refunded. Any unpaid and earned fees will be due and payable. Any fee will consider each client's specific situation and may be negotiated in the Adviser's sole discretion.

The Adviser's fees do not include brokerage/transaction fees, custodian fees or fees charged by other investment advisers that may be retained by a client.

Both Programs

New clients in either Program have five days from signing the agreement to cancel without cost or obligation. Thereafter, in the case of termination of advisory services by either The Adviser or the client, unearned prepaid fees will be refunded on a daily pro-rata basis.

Clients will incur other fees and expenses outside of the Adviser's, including transaction fees, and other related costs and expenses that may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, transaction commissions, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to the Adviser's fee, and the Adviser does not receive any portion of these external fees and expenses.

Neither the Adviser nor any associates accept compensation for the sale of securities or other investment products.

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

The Adviser does not accept any performance-based fees and therefore does not engage in side-by-side management.

Item 7 - Types of clients

Clients of either Program A or Program B may include individuals, trusts, institutions, endowments, and foundations.

Account minimums are \$1,000,000 for Program A and \$50,000,000 for Program B.

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

Program A: Discretionary Management of Investment Grade Senior Note Portfolio

Methods of Analysis:

The notes are selected using a proprietary analytical system that measures and monitors the risk of an issuer defaulting on a coupon, the risk of an issuer defaulting at maturity and the risk of the referenced assets supporting each note decreasing in value. The analytical system utilizes historical statistical modelling and forward-looking outlooks to estimate the default and valuation factors associated with each note.

Investment Strategies:

The Investment Strategy followed within Program A is intended to assemble a portfolio of senior notes issued by large-cap U.S., Canadian and European companies that when combined, provide a competitive level of income. The notes that are purchased will be diversified by tenor, issuer, geography and underlying assets supporting each note. Notes are generally held until called by the issuer or after reaching maturity.

Portfolios are actively managed using a combination of i) portfolio management recommendations set forth by the Adviser's proprietary portfolio management strategies, ii) daily reviews of portfolio and market conditions by the firm's Managing Partner and iii) the client's goals and objectives.

After the initial investment period, each portfolio will be diversified across investment grade issuers, tenor of maturity dates, underlying reference assets and other portfolio characteristics. The asset classes represented in each portfolio will vary depending upon the client's goals and objectives and the market conditions prevailing at the time. The investment analysis and strategy attempt to minimize and manage unintended risks. During the initial portfolio construction period, and, occasionally thereafter, a client's capital may be invested in one or more mutual funds that are sponsored or managed by third parties.

Risks:

General. Investors should understand that all investments involve risk and there can be no guaranty against loss resulting from strategies implemented by the Adviser. Further, there can be no assurance that the Adviser's objectives will be achieved. As with any investment in securities, the value of, and return on an investment, can decrease as well as increase, depending on a variety of factors, including general economic conditions and market factors. The success of the Adviser's investment program will depend in large part on the ability of the Adviser. There is no assurance that the Adviser's investment decisions will always be profitable.

Overall Investment Risk. All securities investments risk the loss of capital. The nature of the securities to be purchased and traded by the Adviser and the investment techniques and strategies employed attempt to increase profits may increase this risk. Many unforeseeable events, including force majeure, market sentiment, actions by various government entities, fiscal policy, monetary policy, global and domestic growth, domestic and international political events and other unforeseen circumstances may cause sharp market fluctuations. Investors must be able to sustain substantial losses on the value of their investment.

Dependence on Key Personnel. The Adviser's investment activities depend upon the experience and expertise of its principal portfolio manager. The loss of the services of the principal could have a material adverse effect on its activities.

Market Turmoil. Markets experienced unprecedented turmoil during the general financial and credit crisis of 2007–2009 and the Covid-19 crisis in 2020. At times during those periods, credit markets became illiquid, banks and other sources of credit ceased lending or significantly increased borrowing costs and equity markets lost substantial value. A return of a similar market turmoil, or new periods of turmoil that present similar stresses, could have an adverse effect on investment performance.

Reduced Liquidity of Investments. Certain securities will have limited liquidity. Such instruments may be difficult to value, and illiquidity can disconnect market values from the historical pricing indicators used in the investment analysis and determination of fair value pricing. In times of extreme market disruption, there may be no market at all for one or more asset classes, potentially resulting in the inability to dispose of assets for an indefinite period.

Currency Risks. A portion of the Adviser's assets are generally invested in securities with valuations that are partially determined with reference to such currencies.

Counterparty and Settlement Risk. Due to the nature of some of the investments which the Adviser makes, the Adviser relies on the counterparty to a transaction to perform its obligations. If such party fails to complete its obligations for any reason, investors may suffer losses.

Call Risk. Securities selected may allow the issuer of the security to call the security before maturity. If the issuer at maturity pays the owner of the security 100% of par value plus any accrued and unpaid coupons, the coupon yield associated with the called security may not be immediately replaced by new securities with the same coupon yields. Client may experience lower coupon levels and lower cash flow if a security is called.

Custody Risk. Institutions, such as brokerage firms, banks and broker-dealers, generally have custody of portfolio assets managed by the Adviser. The Adviser attempts to limit its brokerage and custody transactions to well-capitalized and established banks and brokerage firms in an effort to mitigate such risks. The client is subject to the risk that these firms and other brokers, counterparties or clearinghouses with which it deals may default on their obligations. Any default by any such parties could result in material losses to the investor. Bankruptcy or fraud at one of these institutions could also impair operational capabilities. In addition, securities and other assets deposited with custodians or brokers may not be clearly identified as being assets of the Adviser's clients. The Adviser's clients will generally be an unsecured creditor of its trading counterparties in the event of bankruptcy.

Delayed Receipt of Income By Investor: The senior notes may be subject to terms and market conditions that delay the uninterrupted payment of coupon payments.

Program B: Investment Consulting

Methods of Analysis:

The Adviser provides a wide range of investment consulting services and products, tailored to each client's situation, including but not limited to, the following:

- **Investment Policy Development and Monitoring** – The development of client-specific investment policy is important to tailoring services.
- **Asset Allocation Review** – Asset allocation reviews assist clients in optimizing the balance between portfolio risk and return. Through these reviews, the Adviser may provide clients with portfolio advice that helps them balance their primary objectives.
- **Investment Manager Search and Recommendations** – The Adviser seeks to match client objectives with appropriate investment managers. The combination of quantitative evaluations is complemented by an experienced perspective of qualitative factors.
- **Manager Structure Analysis** – The Adviser may provide clients with analysis explaining how selections and weightings of individual investment vehicles and managers collectively tilt a portfolio toward particular investment styles, sectors or capitalization biases.
- **Portfolio Performance Analysis** – Clients may receive Investment Performance Analytics that describe and analyze the performance of the client's investment managers and total assets.

If an investment strategy is directly recommended, it will have been analyzed for the quality of its management team, capacity, track record, fee levels, regulatory background and other information from time to time. Different investment strategies intended to accomplish similar objective may be recommended from time to time.

Investment Strategies:

The Investment Strategy followed within Program B is intended to accomplish a client's investment objectives while minimizing risks and fees. Each individual client's objectives, tax situation, risk factors, time horizon, cash flow needs, diversification opportunities and other information is considered. Once that information is understood, a client is presented with 1 or more investment strategies that when combined, have been observed to address similar goals and objectives. The investment strategies are either recommended by a third party co-advisor or may be directly recommended by the Adviser and are likely to include equity, fixed income and real asset funds (both registered and non-registered), ETFs, fixed income securities and cash-like securities.

Risks:

Dependence on Key Personnel. The Adviser's investment activities depend upon the experience and expertise of its principal portfolio manager. The loss of the services of the principal could have a material adverse effect on its activities.

General Market Risks: All investments in securities include a risk of losing principal and any profits not yet realized. Clients should be prepared to bear that risk. Financial markets fluctuate substantially over time. In addition, as recent global and domestic economic events have shown, the performance of any investment is not guaranteed.

Risks Associated With Asset Allocation Recommendations: The primary risk of asset allocation recommendations is that a specific asset class (such as equity, fixed-income, alternative investments and cash), and correspondingly a client's portfolio, does not perform as expected in capital market assumptions. Another risk of asset allocation recommendations is that a client may not participate in increases in a particular asset class, industry or market sector.

Risks Associated with Manager, Fund and Investment Vehicle Recommendations: The Adviser generally recommends that clients invest their assets with multiple independent investment managers, ETFs or other funds. The manager and fund recommendations include the following risks:

There Is No Guarantee That Securities Selected By The Manager Will Perform As Anticipated - the manager may not be able to replicate their previous success in future periods. Past performance is no guarantee of future results. As a result, there is a risk of loss of the assets managed by any given manager that is out of the Adviser's control. The Adviser cannot guarantee any level of performance or that clients will not experience a loss of assets.

A Manager May Deviate from their Stated Investment Strategy – Because the Adviser does not control the underlying investments in a manager's portfolio or fund, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio or fund, making it a less suitable investment for a client.

A Manager May Not Have Adequate Internal Controls – Because the Adviser does not control a manager's daily business or compliance operations, it may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

A Manager's Strategy May Involve Additional Risks – Managers and funds face risks based on the strategy they implement or the investments they select. For example, foreign securities face additional risks due to political and socioeconomic developments abroad, as well as due to differences between U.S. and foreign regulatory practices. Another example would be a sector stock fund that invests in a single industry, such as energy. Its value could decline due to developments in the industry even if its investments are sound.

Information The Adviser Relies on May Prove to be Inaccurate – When the Adviser develops recommendations, it relies on information provided by managers and funds, third parties that review managers and funds, and other sources of information. The Adviser relies on the assumption that such information is accurate and unbiased. While the Adviser is attentive to indications that data may be incorrect, there is a risk that analytics may be compromised by inaccurate or misleading information.

Item 9 - Disciplinary Information

On December 9, 2016, Roger Bowden submitted a Letter of Acceptance, Waiver and Consent ("AWC") to FINRA. Without admitting or denying the findings in the AWC, FINRA found that Mr. Bowden participated in outside business activity as an uncompensated advisory board member for a third party private equity fund and allocated expenses in July 2013 across cost centers associated with his company's four subsidiaries using a methodology that was not consistent with the policies and procedures that existed at that time. Mr. Bowden agreed to an eight-month suspension from associating with a FINRA Member firm and a \$15,000 fine.

Item 10 - Other Financial Industry Activities and Affiliations

The Adviser does not receive any compensation from any other financial, advisory, brokerage, custody or any other activity.

Neither the Adviser nor any management persons are registered or have an application pending to register as a broker-dealer or its representative, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities, nor have any other financial industry activity or affiliations.

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

The Adviser has adopted a Code of Ethics that it believe is reasonably designed to identify and mitigate conflicts involving personal securities transactions of the Advisor and its principals, officers, employees and their family members and transactions effected on behalf of clients ("Supervised Persons"). The Adviser's Code of Ethics is available to any client or prospective client upon request.

The Code of Ethics is based on the principle that the Adviser and its employees owe a fiduciary duty to their clients. Thus, employees must (i) place the interests of clients first, (ii) avoid taking inappropriate advantage of their positions within the Adviser and (iii) conduct any personal securities transactions in full compliance with the Code of Ethics. In addition, employees are prohibited from trading on material non-public or "inside" information.

Neither the Adviser or any of its related persons recommend or buys or sells securities for client accounts in which the Adviser and/or the related person have a material financial interest.

On occasion, Supervised Persons of the Adviser may buy or sell the same securities that the Adviser recommends to, or, buys and sells for clients. On such occasions, Supervised Persons are prohibited from front-running or purchasing such securities that in any way disadvantages any of the Adviser's clients and/or advantage Supervised Persons.

Personal transactions conducted by the Adviser's Supervised Persons are subject to the restrictions and procedures set forth in the Adviser's written policies, including its Code of Ethics. The Code of Ethics, among other things, imposes limits on the purchase and sale by Supervised Persons for their own accounts of securities that are in the process of being purchased or sold for clients. In general, Supervised Persons may buy or sell only after similar transactions have been completed for clients, and certain personal securities transactions must be pre-cleared by the Adviser. However, the Adviser will always seek to ensure that it, and its Supervised Persons, act in the best interests of the Adviser's clients.

Supervised Persons must provide periodic reports of personal transactions involving reportable securities to the Adviser's Chief Compliance Officer. The Chief Compliance Officer is responsible for reviewing such reports and monitoring ongoing compliance with the Adviser's written policies and its Code of Ethics.

Item 12 - Brokerage Practices

Program A: Management of Investment Grade Senior Note Portfolios

The Adviser initiates transactions for discretionary accounts through the originating brokers or custodian issuing a senior note being purchased. If several brokers and/or custodians are offering the sale of highly similar senior note security on commercially similar terms, the Adviser will select the issuer, which is often different than the client's custodian, that it deems to be in the best interest of the client(s). The settlement of purchased senior notes is directed to each client's custody accounts.

Fees charged to clients by brokers are not typically transaction fees. Instead, the originating broker or custodian will typically sell a senior note and deduct an Underwriting Fee or commission. For example, if a bank is issuing senior notes with a par value of \$100 per note, the bank may charge the client \$100 per note. When the note settles in the client's account, it may be valued at a price less than \$98. The Issuer will retain \$2 as an Underwriting Fee. The Adviser does not receive any portion of this or any other commission.

In other cases, senior notes may be purchased for client accounts on a "transaction-fee" basis. That means that the broker or custodian through which a client purchases or sells a senior note charges the client a fixed transaction-fee in connection with the transaction. The Adviser does not receive any portion of this transaction-fee.

The Adviser does not permit clients to direct trade execution to a specified broker-dealer other than the custodian, though the Adviser retains the ability to do so. If clients were permitted to direct trade execution, the firm might be unable to achieve most favorable execution of client transactions, and this could cost clients more money. Some advisers do permit clients to direct trade execution.

Brokers and custodians provide trading and custody services for clients on terms determined by those brokers and custodians. The Adviser is not involved in establishing those terms, nor does it receive any amounts paid by those brokers and custodians. Transactions costs associated with purchases and sales, are charged by the broker or custodian at their then current rate. The Adviser does not receive any compensation from any broker or custodian.

The Adviser may execute blocked orders for multiple accounts according to a pre-determined allocation methodology whereby clients receive an average price across all clients consistent with the Adviser's obligation to seek best execution for its Advisory clients.

Custodians with whom the Adviser enters into a custodial agreement will typically provide the Adviser with access to its institutional trading and custody services, which are typically not available to its retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them, once the custodial relationship is established. These services include custody, brokerage, 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.

The availability of these services benefits the Adviser as the Adviser does not have to produce or purchase them independently. In addition, the Adviser does not pay custodians for these services. This presents a conflict of interest in that the Adviser has an incentive to recommend that the client maintain their account with a custodian based on the Adviser's interest in receiving these services that benefit its business rather than based on client interests (i.e., in receiving the best value in custody services and the most favorable execution of client transaction). However, the

Adviser believes the selection of recommended custodians and brokers is in the best interests of clients. The Adviser's selection is based on due diligence performed including the evaluation of the scope, quality, price and overall value of services to clients rather than on those services that benefit only the Adviser.

Also, vendors, in partnership with custodians or portfolio accounting software companies, may offer discounts for their services to the Adviser and its clients.

The Adviser may decline to manage an account maintained at a broker or custodian with which it does not have an existing relationship. Should a client direct transactions to a specific broker not used by the Adviser, the Adviser may be unable to achieve most favorable execution of the client's transactions, and that this practice may cost clients more money.

None of the Adviser's supervised persons accept compensation for the sale of securities.

Program B: Investment Consulting

The Adviser does not have any discretion in selecting brokers and does not have any responsibility for recommending the reasonableness of their compensation with respect to client brokerage accounts and assets. The investment managers retained by a client may have the discretion to determine which brokers are retained by the client.

Item 13 - Review of Accounts

A. For discretionary accounts (Program A), the Adviser has the obligation to monitor and review client accounts to determine if the assets in the account fall within certain asset class, maturities, issuer concentration tolerance levels and geographical concentration exposure tolerance levels established for each portfolio. Accounts may fall outside established tolerances for reasons such as market movements, client contributions or withdrawals. The Adviser is obligated to monitor all accounts and consider periodic adjustments to bring portfolios back within established tolerances. The Adviser will meet or consult remotely with clients at least annually.

B. For non-discretionary accounts (Program B), the Adviser provides a written review for the client, delivered no less than semi-annually. The report includes but is not limited to performance of their portfolio over certain time periods, asset class allocation and a list of holdings.

C. The Adviser has an obligation to engage each client and review their account at least annually.

Item 14 - Client Referrals and Other Compensation

The Adviser may pay compensation to solicitors or other third parties that introduce clients to the Adviser. Any payment of this compensation will not increase the fees paid by any client to the Adviser. The Adviser does not pay any portion of its fee to any other interested party.

Item 15 - Custody

The Adviser does not maintain physical custody of any client asset. However, under certain laws, the Adviser is deemed to have constructive custody of client assets that it manages on a discretionary basis because, under the terms of its standard investment management agreement, it is authorized to instruct a custodian to withdraw or deduct fees from a client's account. The Adviser relies on the following safeguards:

- Clients provide the custodian with written authorization to deduct fees from the account held with the custodian.
- Each time a fee is deducted from a client account, the Adviser (a) sends the custodian an invoice specifying the amount of the fee to be deducted; and (b) provides information on the client's quarterly performance summary, specifying and itemizing the fee.
- The custodian sends statements at least quarterly to the client showing disbursements from the account, including management fees deducted at the Adviser's request.

The Adviser encourages investors to carefully review account statements from the independent custodian, and to compare those against any invoices or reports that may be issued from the Adviser and immediately notify the Adviser of any discrepancies. Market values on custodial statements may occasionally vary from reports issued by the Adviser due to different reporting dates or valuation sources for the securities held in the account.

Item 16 - Investment Discretion

Program A: Management of Investment Grade Senior Note Portfolios

The Adviser has investment discretion meaning that it determines which securities to buy or sell, which broker dealer securities are purchased from as well as the amounts and timing of such transactions with the broker-dealer. This discretionary authority is provided to the Adviser pursuant to an Investment Management Agreement entered with the client. Implementation of all investment decisions relating to a discretionary account will be at the discretion of the Adviser and consistent with any client guidelines and restrictions that have been provided in writing to, and accepted by, the Adviser.

Program B: Investment Consulting

The Adviser does not accept any discretion in selecting securities to buy or sell, brokers or custodians with respect to client assets.

Item 17 - Voting client Securities

Program A: Management of Investment Grade Senior Note Portfolios

The Adviser does not anticipate any investment grade senior note will require any voting decisions to be made and does not accept authority to vote client securities. If a client is required to vote on behalf of a security or its issuer, the Adviser will be available to address any questions.

Program B: Investment Consulting

The Adviser does not accept authority to vote client securities.

Item 18 - Financial Information

A. The Adviser does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

B. No financial condition currently exists that is reasonably likely to impair the Adviser's ability to meet its contractual commitments to clients. The Adviser has never been the subject of a bankruptcy petition.

Item 19 – Requirements for State-registered Advisers

Roger Bowden is the principal executive officer for the firm. Please refer to his Brochure Supplement immediately following for his business background and education.

Neither the firm nor any supervised person is compensated for advisory services with performance-based fees.

Neither the firm nor any management person has been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding, other than as discussed in Item 2B-3 Disciplinary Information, in the Brochure Supplement immediately following.

Neither the Firm nor any management person has any relationship or arrangement with issuers of securities.

Summit View Capital Advisors

Part 2B of Form ADV: Brochure Supplement

Roger C. Bowden
Chief Investment Officer
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Highlands Ranch, CO 80126
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March 2024

This Brochure Supplement provides information about Roger Bowden that supplements the Summit View Capital Advisors, LLC Brochure (Form ADV Part 2A) described above. You should have received a copy of that Brochure. Please contact us if you have any questions about the contents of the Brochure or this supplement.

Additional information about Roger Bowden is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2B-1- Educational Background

Roger Bowden, Year of Birth 1960.

Education : B.A. Economics, 1985
 The University of New Mexico,

 MBA International Finance, 1990
 Robert O. Anderson School of Management, University of New Mexico,

 M.A. Economics, 1992
 The University of New Mexico

Item 2B-2 Business Background:

Hanseatic Group, Inc. 1988-1992
Currency Trader
Investment Analyst

Portfolio Management Consultants, Inc. 1992 – 1997
Director of Research
Senior Investment Consultant
Chief Investment Officer
Voting Member of the Investment Committee

Investment Consulting Group, Inc. 1998 - 2003
Co-Founder
Chief Investment Officer
Voting Member of the Investment Committee

Mount Yale Capital Group., 2003 – 2015
Co-Founder and Managing Partner
President, 2003 – 2015
Voting Member of the Investment Committee

Mount Yale Asset Management, 2003 - 2015
Co-Founder and Managing Partner
President, 2003 – 2015
Voting Member of the Investment Committee

Princeton Fund Advisers, 2011 – 2015
Co-Founder and Managing Partner
Voting Member of the Investment Committee

Bow River Capital Partners, 2012 – 2013
Private Equity Fund Adviser Committee

Pinnacol Assurance, 2016 - Present
Voting Member of the Investment Committee

Item 2B-3- Disciplinary Information:

On December 9, 2016, Roger Bowden submitted a Letter of Acceptance, Waiver and Consent (“AWC”) to FINRA. Without admitting or denying the findings in the AWC, FINRA found that Mr. Bowden participated in outside business activity as an uncompensated advisory board member for a third-party private equity fund and allocated expenses in July 2013 across cost centers associated with his company’s four subsidiaries using a methodology that was not consistent with the policies and procedures that existed at that time. Mr. Bowden agreed to an eight-month suspension from associating with a FINRA Member firm and a \$15,000 fine.

Item 2B-4- Other Business Activities

Roger Bowden serves on the Investment Committee for Pinnacol Assurance, a public/private insurance company. Approximately 12 hours per year are dedicated to this activity.

Item 2B-5- Additional Compensation

Roger Bowden receives immaterial compensation from Pinnacol Assurance for serving on its investment committee.

Item 2B-6 - Supervision

Mr. Bowden is the Manager Partner and Chief Compliance Officer of the Adviser, is self-supervised, and will adhere to the Adviser’s policies and procedures.

Item 2B-7 - Requirements for State-Registered Advisers

Other than as disclosed in Item 3 (above), Mr. Bowden has not been involved in any of the following legal, disciplinary, or regulatory events:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:

- a. an investment or an *investment-related* business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.
2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:
- a. an investment or an *investment-related* business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.

Mr. Bowden has never been the subject of a bankruptcy petition.