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PART 2A OF FORM ADV

FIRM BROCHURE

October 1, 2012

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).

## Item 2 - MATERIAL CHANGES

The version of our Form ADV dated March 15, 2012 had the following explanation about material changes at Summit:

“The January, 2012 issue of Financial Planning Magazine included an article entitled “RIA Leaders: The top 50 Firms Ranked by AUM and Growth, Plus Practices to Watch.” The term “AUM” is an abbreviation for Assets Under Management. The article includes a report on “Emerging Firms ranked by AUM.” Summit is listed in the report as adding \$211,640,000 in assets or growing by more than 650% since 2008. This appears to be a material change requiring explanation.

In prior years we have referred to our offices in Florida as the Florida Division of Summit. Over the years we have considered succession planning and management continuity issues for the firm as we have grown, primarily by acquiring smaller wealth management practices. In 2011 we acquired another firm in Florida (CRD # 134620) and renamed it Summit Wealth Partners, Inc. and filed a trade name for it to do business as Summit Wealth Management, Inc.

As you probably know, succession planning and management are complex and intricate issues for privately owned firms. We decided to begin the succession planning process for our Florida offices by creating a pair of sister corporations that remain under the same ownership and control as before. This resulted in the dramatic change in AUM noted in the magazine article. The actual growth for the firm last year was less than the materiality standard of 10%. In 2012 we intend to continue considering how to implement a long term succession plan.”

On October 1, 2012 we implemented our long term succession plan by transferring ownership of the firm to a holding company that is owned by the senior management team that most clients have been working with for many years. Messers Mitch Levin, Chad Warrick and Jason Print now have equity interests in Summit. We are pleased and proud to notify you about this. It is why we are sending you this amended SEC Form ADV Part 2A.

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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. Over the years we have expanded our business primarily by acquiring smaller firms.

Summit is 100% owned by Investors Advocate LLC, a financial services holding company that is 100% owned by Messers Levin, Warrick and Print. Dr. Levin is Summit’s President and Mr. Warrick is the Chief Compliance Officer. We would be glad to speak with you about Summit at any time. We can be reached in our Orlando, Florida office at 407-656-2252.

### OUR SERVICES

Summit provides wealth management and investment management services primarily to individuals. We also provide investment management services to other types of clients such as charitable organizations, trusts, foundations, pension and profit-sharing plans and business entities. Individuals associated with Summit provide our services. Such individuals are called Investment Adviser Representatives. Information about each of our Investment Adviser Representatives is available in the documents known as “Supplemental Brochures” which are Part 2B of this form.

### 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.

We may recommend life insurance, disability insurance, or annuities. Summit has a business relationship with the Summit Asset Protection Group, LLC to assist in that recommendation. Some of our employees may be sequentially employed by the Asset Protection Group.

## OUR ASSETS UNDER MANAGEMENT

As of October 1, 2012, depending upon the markets' values, we managed approximately \$250,000,000 of client assets. Of this total amount, approximately \$235,000,000 was managed on a discretionary basis and \$15,000,000 on a non-discretionary basis.

## ITEM 5 - FEES AND COMPENSATION

## FEES FOR OUR 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 0.85% and 2.00% (some legacy accounts may vary) 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.

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 ranging from \$1,100 to \$10,000. Neither Summit itself, nor any Summit employee receives commissions on the sale of investments. Commissions for annuities and life and disability and other insurances inure directly to the individual or entity licensed to sell those insurances.

Our fees are stated in the Financial Services Agreement each client signs. This Agreement defines our relationship with you. It describes the services we will provide and your 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.

## 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.

## 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. We only use or recommend no-load 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 engages in the practice known as side-by-side management.

## Item 7 - TYPES OF CLIENTS

Summit offers personalized wealth management and investment management services primarily 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 to other types of clients such as charitable organizations, trusts, foundations, pension and profit-sharing plans and business entities. There is no account minimum for these types of clients.

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 may utilize different investment strategies, based upon the needs of the client, including long-term purchases, short-term purchases and option writing.

### 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 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)

Equity-based exchange traded funds are subject to risks similar to those of stocks. Fixed income-based ETFs are subject to risks similar to those of bonds such as increasing interest rates. Investment returns will fluctuate and are subject to market volatility, so that an investor's ETF shares, when redeemed or sold, may be worth more or less than their original cost.

#### 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 products.

## 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 ever been disciplined by a financial regulatory agency.

The former owner of the separately managed Summit Wealth Management, Inc. in Atlanta, on his own, has been charged and sanctioned by regulators. His activities did not impact our business.

## 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 the Asset Protection Group, which is also housed in Summit's Orlando offices. These "dual" employees, or the 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. Mitch Levin is President of The Ivanhoe Foundation, Inc., a charitable enterprise. Dr. Levin also is president of 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 or sell 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 Institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. member FINRA/SIPC/NFA (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. 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 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

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.

##### TD Ameritrade disclosure.

As disclosed under item 12, Summit participates in TD Ameritrade's institutional advisor 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.

Summit may receive succession planning, practice valuation, and equity management services from third-party vendors through Summit's participation in the TD Ameritrade Institutional Equity Management Program. In addition to meeting the minimum eligibility criteria for participation in the TD Ameritrade Institutional Equity Management Program, Summit may have been selected to participate in the TD Ameritrade Institutional Equity management Program based on the amount and potential profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with Advisor and there is no employee or agency relationship between TD Ameritrade and Summit. TD Ameritrade has established the TD Ameritrade Institutional Equity Management Program as a means of assisting independent unaffiliated Advisors to grow and maintain their respective investment advisory businesses. TD Ameritrade does not supervise Summit and has no responsibility for Summit's management of client portfolios or Summit's other advice or services to clients.

Summit's participation in the TD Ameritrade Institutional Equity Management Program raises potential conflicts of interest. Summit may encourage its clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to participate in the TD Ameritrade Institutional Equity Management Program, Summit may have an incentive to recommend to clients that the assets under management by Summit be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. Summit's participation in

the TD Ameritrade Intuitional Equity Management Program does not relieve Summit of the duty to seek best execution of trades for client accounts.

#### 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 us 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.

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.