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Name of Investment Adviser: <b>Summit Portfolio Management, Inc.</b>				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code Telephone Number
<b>1801 Century Park East #475</b>	<b>Los Angeles</b>	<b>CA</b>	<b>90067</b>	<b>310 590-7777</b>

**This part of Form ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)
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Potential Persons who are not to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

**1. A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

**Applicant:**

<input checked="" type="checkbox"/> (1) Provides investment supervisory services	<b>95</b> %
<input type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services	_____ %
<input type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above	_____ %
<input type="checkbox"/> (4) Issues periodicals about securities by subscription	_____ %
<input type="checkbox"/> (5) Issues special reports about securities not included in any service described above	_____ %
<input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which client may use to evaluate securities	_____ %
<input checked="" type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	<b>5</b> %
<input type="checkbox"/> (8) Provides a timing service	_____ %
<input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above	_____ %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

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**B.** Does applicant call any of the services it checked above financial planning or some similar term? Yes No

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**C.** Applicant offers investment advisory services for: (check all that apply)

<input checked="" type="checkbox"/> (1) A percentage of assets under management	<input type="checkbox"/> (4) Subscription fees
<input checked="" type="checkbox"/> (2) Hourly charges	<input type="checkbox"/> (5) Commissions
<input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input type="checkbox"/> (6) Other

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**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

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**2. Types of Clients** -- Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/> A. Individuals	<input type="checkbox"/> E. Trusts, estates, or charitable organizations
<input type="checkbox"/> B. Banks or thrift institutions	<input type="checkbox"/> F. Corporations or business entities other than those listed above
<input type="checkbox"/> C. Investment companies	<input type="checkbox"/> G. Other (describe on Schedule F)
<input checked="" type="checkbox"/> D. Pension and profit sharing plans	

**3. Types of Investments** Applicant offers advice on the following: (check those that apply)

- |   |   |
|---|---|
| <p>A. Equity securities</p> <p><input type="radio"/> (1) exchange-listed securities</p> <p><input type="radio"/> (2) securities traded over-the-counter</p> <p><input type="radio"/> (3) foreign issuers</p> <p><input type="radio"/> B. Warrants</p> <p><input type="radio"/> C. Corporate debt securities<br/>(other than commercial paper)</p> <p><input type="radio"/> D. Commercial paper</p> <p><input type="radio"/> E. Certificates of deposit</p> <p><input type="radio"/> F. Municipal securities</p> <p>G. Investment company securities:</p> <p><input type="radio"/> (1) variable life insurance</p> <p><input type="radio"/> (2) variable annuities</p> <p><input type="radio"/> (3) mutual fund shares</p> | <p><input type="radio"/> H. United States governmental securities</p> <p>I. Options contracts on:</p> <p><input type="radio"/> (1) securities</p> <p><input type="radio"/> (2) commodities</p> <p>J. Futures contracts on:</p> <p><input type="radio"/> (1) tangibles</p> <p><input type="radio"/> (2) intangibles</p> <p>K. Interests in partnerships investing in:</p> <p><input type="radio"/> (1) real estate</p> <p><input type="radio"/> (2) oil and gas interests</p> <p><input type="radio"/> (3) other (explain on Schedule F)</p> <p><input type="radio"/> L. Other (explain on Schedule F)</p> |
|---|---|

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

- |                                       |   |
|---------------------------------------|---|
| <input type="radio"/> (1) Charting    | <input type="radio"/> (4) Cyclical                      |
| <input type="radio"/> (2) Fundamental | <input type="radio"/> (5) Other (explain on Schedule F) |
| <input type="radio"/> (3) Technical   |   |

B. The main sources of information applicant uses include: (check those that apply)

- |   |   |
|---|---|
| <input type="radio"/> (1) Financial newspapers and magazines    | <input type="radio"/> (5) Timing services   |
| <input type="radio"/> (2) Inspections of corporate activities   | <input type="radio"/> (6) Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| <input type="radio"/> (3) Research materials prepared by others | <input type="radio"/> (7) Company press releases  |
| <input type="radio"/> (4) Corporate rating services             | <input type="radio"/> (8) Other (explain on Schedule F)   |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |   |   |
|---|---|
| <input type="radio"/> (1) Long term purchases (securities held at least a year) | <input type="radio"/> (5) Margin transactions   |
| <input type="radio"/> (2) Short term purchases (securities sold within a year)  | <input type="radio"/> (6) Option writing, including covered options, uncovered options, or spreading strategies |
| <input type="radio"/> (3) Trading (securities sold within 30 days)              | <input type="radio"/> (7) Other (explain on Schedule F)   |
| <input type="radio"/> (4) Short sales   |   |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**5. Education and Business Standards.** Yes No

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?.....

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

<ul style="list-style-type: none"> <li>• name</li> <li>• year of birth</li> </ul>	<ul style="list-style-type: none"> <li>• formal education after high school</li> <li>• business background for the preceding five years</li> </ul>
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**7. Other Business Activities.** (check those that apply)

A. Applicant is actively engaged in a business other than giving investment advice.

B. Applicant sells products or services other than investment advice to clients.

C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

A. Applicant is registered (or has an application pending) as a securities broker-dealer.

B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.

C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<ul style="list-style-type: none"> <li><input type="radio"/> (1) broker-dealer</li> <li><input type="radio"/> (2) investment company</li> <li><input type="radio"/> (3) other investment adviser</li> <li><input type="radio"/> (4) financial planning firm</li> <li><input type="radio"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant</li> <li><input type="radio"/> (6) banking or thrift institution</li> </ul>	<ul style="list-style-type: none"> <li><input type="radio"/> (7) accounting firm</li> <li><input type="radio"/> (8) law firm</li> <li><input type="radio"/> (9) insurance company or agency</li> <li><input type="radio"/> (10) pension consultant</li> <li><input type="radio"/> (11) real estate broker or dealer</li> <li><input type="radio"/> (12) entity that creates or packages limited partnerships</li> </ul>
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(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

Yes No

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?...

(If yes, describe on Schedule F the partnerships and what they invest in.)

**9. Participation of Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

<b>10. Conditions for Managing Accounts.</b> Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services <i>and</i> impose a minimum dollar value of assets or other conditions for starting or maintaining an account?	Yes No
(If yes, describe on Schedule F.)	<input checked="" type="checkbox"/> <input type="checkbox"/>

**11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggers factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Summit Portfolio Management, Inc. supervises the investment of the client's account in accordance with the investment objectives of the client. The fee for this service is a quarterly investment advisory fee equal to, or less than, .5% of the market value in the client's account. The minimum quarterly fee shall be \$500.

Client account reviews are performed at least on a quarterly basis. Principal, Timothy F. Bock, is responsible for account reviews. Accounts under periodic review number approximately 160.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

Client reports are provided quarterly and include investment gain or loss information, rates of return for respective investments within the portfolio, portfolio return, and other pertinent information. Year-end tax reports are provided and include realized and unrealized gains or losses, investment expenses and tax treatment of dividends and investment income.

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |                       |                       |
|--|-----------------------|-----------------------|
| (1) securities to be bought or sold? .....               | Yes                   | No                    |
|  | <input type="radio"/> | <input type="radio"/> |
| (2) amount of the securities to be bought or sold? ..... | Yes                   | No                    |
|  | <input type="radio"/> | <input type="radio"/> |
| (3) broker or dealer to be used? .....                   | Yes                   | No                    |
|  | <input type="radio"/> | <input type="radio"/> |
| (4) commission rates paid? .....                         | Yes                   | No                    |
|  | <input type="radio"/> | <input type="radio"/> |

B. Does applicant or a related person suggest brokers to clients? .....  Yes  No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commission higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |   |                       |                       |
|---|-----------------------|-----------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes                   | No                    |
|   | <input type="radio"/> | <input type="radio"/> |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes                   | No                    |
|   | <input type="radio"/> | <input type="radio"/> |

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
  - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? .....  Yes  No

**Schedule F of  
Form ADV  
Continuation Sheet for Form ADV  
Part II**

Applicant: <b>Summit Portfolio Management, Inc.</b>	SEC File Number: <b>801- 46423</b>	Date: <b>03/10/2009</b>
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: <b>Summit Portfolio Management, Inc.</b>	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer																								
	<p>1.A (1) Summit Portfolio Management, Inc. offers a fee-based investment advisory service. The fee for this service is 2% (or less) of the market value of the client account. the minimum annual fee is \$2,000. Prorated fees are due upon execution of the Advisory Agreement. Subsequent quarterly fees are computed based upon the table below and are deducted quarterly in advance from the client account, fees may be reduced at the discretion of Summit Portfolio Management, Inc.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 50%;"></th> <th style="width: 25%;">PER QUARTER</th> <th style="width: 25%;">PER ANNUM</th> </tr> </thead> <tbody> <tr> <td>First \$250,000</td> <td>.50%</td> <td>2.00%</td> </tr> <tr> <td>Next \$250,000</td> <td>.25%</td> <td>1.00%</td> </tr> <tr> <td>Next \$500,000</td> <td>.20%</td> <td>.80%</td> </tr> <tr> <td>Next \$1,000,000</td> <td>.15%</td> <td>.60%</td> </tr> <tr> <td>Next \$2,000,000</td> <td>.125%</td> <td>.50%</td> </tr> <tr> <td>Next \$5,000,000</td> <td>.10%</td> <td>.40%</td> </tr> <tr> <td>Next amounts over \$10,000,000</td> <td>.075%</td> <td>.30%</td> </tr> </tbody> </table> <p>Minimum Account Size: \$250,000</p> <p>Each client signing an agreement will receive a copy of Form ADV Part II and shall be given five (5) business days to unconditionally rescind the agreement. The Summit Portfolio Management, Inc. Advisory Agreement may be terminated by either party upon thirty (30) days prior written notice to the other party. The agreement will be terminated unless all appropriate fees have been paid. Clients wishing to terminate the agreement during any quarter will receive a prorated refund based on the number of days of service actually received.</p> <p>The objective of Summit Portfolio Management, Inc. investment advisory service is to obtain capital growth and /or income and preserve purchasing power. The principal strategies utilized are Modern Portfolio Theory and passive management strategies. Each portfolio is developed based on the client's risk tolerance. Summit Portfolio Management, Inc will not act as a custodian for the client's account, but may issue instructions to the custodian, as agent and attorney-in-fact with respect to the client's account, to exchange or otherwise trade in specific investment products selected by Summit Portfolio Management, Inc. The client agrees to and understands that the risks of the client's investment program are to be borne solely by the client and/or the client's account.</p>		PER QUARTER	PER ANNUM	First \$250,000	.50%	2.00%	Next \$250,000	.25%	1.00%	Next \$500,000	.20%	.80%	Next \$1,000,000	.15%	.60%	Next \$2,000,000	.125%	.50%	Next \$5,000,000	.10%	.40%	Next amounts over \$10,000,000	.075%	.30%
	PER QUARTER	PER ANNUM																							
First \$250,000	.50%	2.00%																							
Next \$250,000	.25%	1.00%																							
Next \$500,000	.20%	.80%																							
Next \$1,000,000	.15%	.60%																							
Next \$2,000,000	.125%	.50%																							
Next \$5,000,000	.10%	.40%																							
Next amounts over \$10,000,000	.075%	.30%																							

**Schedule F of  
Form ADV  
Continuation Sheet for Form ADV  
Part II**

Applicant: <b>Summit Portfolio Management, Inc.</b>	SEC File Number: <b>801- 46423</b>	Date: <b>03/10/2009</b>
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: <b>Summit Portfolio Management, Inc.</b>	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
	<p>1.A (7) Financial Planning Advice Summit Portfolio Management, Inc. offers computerized financial plans for clients. Clients execute an Advisory Contract agreeing to pay Summit Portfolio Management, Inc. for these services at a rate not to exceed \$250 per hour. Typically, a comprehensive plan will cost between \$2,500 and \$15,000 and will include all or part of a tax plan, portfolio analysis, insurance needs analysis retirement plan, and estate plan. The fee for a financial plan is payable in advance. The clients are given up to five (5) business days after signing the Advisory Contract and receiving a copy of Form ADV Part II to unconditionally rescind the contract.</p> <p>Clients may terminate the agreement at any time, and a refund of the unearned fees will be made, based on the time and effort expended by Summit Portfolio Management, Inc. before termination. Otherwise, the agreement terminates upon delivery of any specified reports, or upon performance of specified services.</p> <p>4.A (5) Summit Portfolio Management develops and manages investment portfolios based on the principles of Modern Portfolio Theory and the Efficient Market Hypothesis.</p> <p>4.B (8) Sources of research materials include: Dimensional Fund Advisors, Ibbotson Associates and Morningstar.</p> <p>5. Educational requirements or business experience for those providing investment advice include at least five years in the investment profession or professional designation such as CFP or CFA.</p> <p>6. Timothy F. Bock: Principal Year of birth 1957</p> <p>Most recent five years business experience: Summit Portfolio Management - President</p> <p>Formal Education: Arizona State University 1976-1981: Engineering</p>

**Schedule F of  
Form ADV  
Continuation Sheet for Form ADV  
Part II**

Applicant: <b>Summit Portfolio Management, Inc.</b>	SEC File Number: <b>801- 46423</b>	Date: <b>03/10/2009</b>
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: <b>Summit Portfolio Management, Inc.</b>	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
	<p>Simon Reeves, Financial Advisor</p> <p>Most recent 5 years business experience:  Summit Portfolio Management, Financial Advisor, 5/07 – present  HSR Holdings, Inc. Private Investor/Entrepreneur 1/06 – 5/07  Novashield Technologies, Inc. Chief Executive Officer/Venture Capital Investor 12/02 – 12/05  AXA Advisors, LLC, Registered Investment Advisor 6/03 – 4/04  Newport Trading, LLC, Owner/President 3/98 – 12/03</p> <p>Formal Education  University of Michigan  B.A. 06/1994</p> <p>7.A  Registrant provides financial planning services.</p> <p>7.B  Registrant carries a California Life and Disability Insurance License</p> <p>1) Determine the investor’s risk profile and investment objectives.</p> <p>Registrant determines the investor’s investment objectives, investment time horizon, and risk profile by means of an interview process and the completion of a questionnaire.</p> <p>2) Set a relevant asset allocation policy for the investor.</p> <p>The investor chooses one of many mutual fund asset allocation models. The investor may also purchase the individual mutual funds without choosing one of the asset allocation models. If the investor so chooses, automatic rebalancing to model allocation and recommended model allocation changes will not be available.</p> <p>3) Diversify among asset classes and styles.</p>

**Schedule F of  
Form ADV  
Continuation Sheet for Form ADV  
Part II**

Applicant: <b>Summit Portfolio Management, Inc.</b>	SEC File Number: 801- <b>46423</b>	Date: 03/10/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: <b>Summit Portfolio Management, Inc.</b>	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
	<p>Jonathan Carr, Financial Advisor</p> <p>Most recent 5 years business experience:</p> <p>Summit Portfolio Management, Financial Advisor, 04/09 – present</p> <p>Financial Advisor – Wedbush Morgan Securities 4/08 – 11/08</p> <p>Business Conduct Supervisor – Wedbush Morgan Securities 03/06 – 03/08</p> <p>Legal Assistant – Davis &amp; Harman, LLP 12/98 – 12/05</p> <p>5. PFP, UCLA Personal Financial Planning Certificate: December 2008</p> <p>Formal Education</p> <p>MA, Sociology: (Sociology of Money), University of Maryland, College Park, 2001</p> <p>BA, Political Science &amp; Sociology: State Univ. of New York, Buffalo, 1996, Cum Laude</p> <p>7.A</p> <p>Registrant provides financial planning services.</p> <p>7.B</p> <p>Registrant carries a California Life and Disability Insurance License</p> <p>1) Determine the investor’s risk profile and investment objectives.</p> <p>Registrant determines the investor’s investment objectives, investment time horizon, and risk profile by means of an interview process and the completion of a questionnaire.</p>

**Schedule F of  
Form ADV  
Continuation Sheet for Form ADV  
Part II**

Applicant: <b>Summit Portfolio Management, Inc.</b>	SEC File Number: <b>801- 46423</b>	Date: <b>03/10/2009</b>
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: <b>Summit Portfolio Management, Inc.</b>	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
	<p>2) Set a relevant asset allocation policy for the investor.</p> <p>The investor chooses one of many mutual fund asset allocation models. The investor may also purchase the individual mutual funds without choosing one of the asset allocation models. If the investor so chooses, automatic rebalancing to model allocation and recommended model allocation changes will not be available.</p> <p>3) Diversify among asset classes and styles.</p> <p>These benefits include: receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving advisor participants; 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.</p> <p>As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first.</p> <p>These benefits may indirectly influence Advisor’s choice of TD Ameritrade as the broker-dealer.</p> <p>13.B Advisor participates in AdvisorDirect, a referral program established by TD Ameritrade, an independent and unaffiliated broker-dealer. Advisor pays fees, not to exceed 15% of the advisory fee that the client pays to Advisor, to TD Ameritrade in connection with successful referrals made through AdvisorDirect. Conflicts of interest may arise from Advisor’s participation in this referral program. Advisor will not charge any fees or costs higher than Advisor’s standard fee schedule offered to other advisory clients or otherwise pass referral fees paid to TD Ameritrade to its clients. Advisor’s duty of “best execution” is not eliminated by its participation in the program; Registrant conducts annual best execution analysis to ensure TD Ameritrade provides competitive pricing. Advisor and TD Ameritrade are independent of one another and</p>

**Schedule F of  
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Applicant: <b>Summit Portfolio Management, Inc.</b>	SEC File Number: <b>801- 46423</b>	Date: 03/10/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Form ADV: <b>Summit Portfolio Management, Inc.</b>	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
	<p>have neither an agency nor employment relationship. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, Advisor may have been selected based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Advisor's client accounts maintained at TD Ameritrade. Advisor has agreed not to solicit clients referred through AdvisorDirect to transfer their brokerage accounts from TD Ameritrade or establish brokerage or custody accounts at other custodians other than when its fiduciary duties require it to recommend other broker-dealers or custodians.</p> <p>Advisor will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by Advisor from any of a referred client's family members, including a spouse, child or any other family member who resides with the referred client and hired Advisor on the recommendation of such referred client.</p>